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The CGSS exam covers a wide range of topics related to global sanctions, including the legal and regulatory framework surrounding sanctions, sanctions risk assessment, and sanctions compliance program management. CGSS exam also covers practical skills such as risk analysis, screening and filtering, and sanctions investigation. CGSS Exam is designed to be challenging and comprehensive, and passing it requires a thorough understanding of the sanctions compliance landscape.

ACAMS Certified Global Sanctions Specialist Sample Questions (Q36-Q41):

NEW QUESTION # 36

Which of the following statements is/are true for Proximal and distal causes?

- A. The process of causation can't be examined to define the order and relations among relevant variables.
- B. Prior events leading to the proximal cause, removed in the sequence of causal events are referred to as distal causes
- C. A proximal cause is an event that immediately precedes the outcome of interest.
- D. Causal pathways are defined by detailing steps, tracing backward from the outcome, or forward from an initial event.
- E. The steps from distal and proximal causes to an input of interest are referred to as a chain of causation.

Answer: B,C,D

NEW QUESTION # 37

According to the Office of Foreign Assets Control guidance on virtual currency, in which way can virtual currencies be blocked?

- A. Deny access to the virtual currency and report blocked assets.
- B. Move the virtual currency to a centralized wallet where other blocked currencies are being held.
- C. Transfer to traditional fiat currency and hold such blocked property in an interest-bearing account.
- D. Return the currency to the exchange owner's domain.

Answer: A

Explanation:

OFAC guidance clarifies that blocking virtual currency means preventing any access, transfer, or withdrawal of the asset by the sanctioned party. The entity holding the virtual currency must:

Deny access to the wallet or virtual asset, and

Report the blocked property to OFAC in accordance with reporting rules.

Virtual currencies are not "returned" (A), not necessarily moved to a pooled wallet (B), and are not converted to fiat unless authorized (C).

Reference:

OFAC Virtual Currency Guidance on blocking and reporting.

Requirements for preventing access to digital assets belonging to sanctioned persons.

NEW QUESTION # 38

A sanctions officer is reviewing a report showing increased activity at an international branch with a large population of expatriates from a newly sanctioned jurisdiction. Which are red flags for identifying clients with increased sanctions or AML risk? (Select Two.)

- A. New accounts that are experiencing a sudden rise in value being transferred to the institution from higher risk countries without clear business rationale
- B. Publicly traded corporate vehicles
- C. Established accounts that send or receive funds from non-sanctioned institutions or institutions active on SWIFT
- D. Privately held companies conducting international wire transfers through institutions distinct from company registration
- E. Regulated entities with a clear web presence with a verifiable business background

Answer: A,D

Explanation:

Red flags for sanctions and AML risk include:

* Privately held companies using institutions outside their jurisdiction of registration, a known structuring and sanctions-evasion

indicator.

* Sudden rises in value from high-risk countries without business justification, a classic AML and sanctions red flag indicating possible sanctions circumvention, layering, or illicit value transfer.

Publicly traded entities and regulated firms generally present lower risk due to transparency. Routine SWIFT activity alone is not a red flag.

Reference:

AML/sanctions red-flag indicators related to wire transfers and unexplained value movement.

Risk characteristics of opaque private companies and cross-border financial behavior.

NEW QUESTION # 39

Which of the following statements states that the attacks are indiscriminate?

- A. Proportionate attacks
- B. Utilizing weapons that are capable of distinguishing between civilian and military targets.
- C. **Employ a method or means of combat which cannot be directed at a specific military objective.**
- D. **Employ a method or means of combat, the effects of which cannot be limited.**
- E. **Attacks are not directed at a specific military objective.**

Answer: C,D,E

NEW QUESTION # 40

EU Restrictive Measures apply: (Select Two.)

- A. within a non-EU country, which has a double taxation convention with all EU Member States.
- B. within a non-EU country which is part of the Customs Union agreement with the EU.
- C. to a company incorporated under the law of a non-EU country, that is 45% owned by a national of an EU Member State.
- D. **on a vessel under the jurisdiction of an EU Member State.**
- E. **to a company outside the territory of the EU, which is incorporated or constituted under the law of an EU Member State.**

Answer: D,E

Explanation:

EU Restrictive Measures apply to all persons and entities within the territory of the EU, including airspace and territorial waters, and to any vessel or aircraft under the jurisdiction of an EU Member State. This establishes that sanctions obligations extend to vessels registered under EU jurisdictions regardless of location.

EU sanctions also apply to all legal persons, entities, and bodies incorporated or constituted under the law of an EU Member State, even when those entities operate entirely outside EU territory. Legal incorporation under EU law creates an ongoing obligation to comply with EU sanctions.

EU ownership by itself does not trigger sanctions applicability, so a non-EU company that is 45% owned by an EU national does not fall under EU Restrictive Measures. Additionally, arrangements such as double-taxation conventions or participation in customs union agreements do not extend the territorial or legal applicability of EU sanctions to non-EU jurisdictions.

Reference from Sanctions and Compliance Domains:

Territorial applicability of EU sanctions, including vessels and aircraft under Member State jurisdiction.

Applicability to companies incorporated under EU Member State law regardless of geographic operations.

Legal and territorial definitions outlining the scope of EU Restrictive Measures.

NEW QUESTION # 41

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