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ACAMS CGSS

Certified Global Sanctions Specialist

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ACAMS Certified Global Sanctions Specialist Sample Questions (Q45-Q50):

NEW QUESTION # 45

Where the financial sanction is an asset freeze, it is generally prohibited to do which of the following:

- A. Deal with the frozen funds or economic resources, belonging to or owned, held or controlled by a designated person
- B. You gain access to certain exclusive benefits
- C. Make funds or economic resources available, directly or indirectly, to, or for the benefit of, a designated person
- D. Engage in actions that, directly or indirectly, circumvent the financial sanctions prohibitions

Answer: A,C,D

NEW QUESTION # 46

Asset freezing legislation generally permits a person to make which of the following payments into a frozen account without the need for a license from OFSI, so long as those funds are frozen after being paid in:

- A. Any interest or earnings on the account
- B. Any payments due to a designated person under contracts, agreement or obligations that were concluded or arose before the date the person became sanctioned
- C. Any payment from an unknown source
- D. Any interest or earnings that is not on the account

Answer: A,B

NEW QUESTION # 47

Based on the Wolfsberg Guidance on Sanctions Screening, what are the core principles for generating productive alerts? (Select Two.)

- A. Addressing the inclusion of a "good guy" list so that it does not suppress common false positives
- B. Reducing the threshold settings from the optimal level to create more productive alerts
- C. Manual processes that ensure lists are screened only against specific jurisdictional data
- D. Reviewing and removing reference data from screening, on an ongoing basis, once the data is no longer risk relevant
- E. Including exclusions for parties that pose low risks to be omitted from screening

Answer: A,D

Explanation:

The Wolfsberg Guidance identifies that effective sanctions screening depends on high-quality, risk-relevant reference data.

Institutions must regularly review and remove outdated or irrelevant data to avoid generating unnecessary alerts and ensure screening outputs remain meaningful. Maintaining accurate and current data reduces noise and increases the productivity of alerts.

The Guidance also emphasizes that institutions may use "good guy lists" to reduce false positives, but these lists must be maintained in a controlled way to ensure they do not unintentionally suppress alerts that could indicate sanctions risk. Proper governance must accompany good-guy lists so that risk-relevant entities are not excluded from screening.

The Guidance does not support reducing thresholds to generate more alerts, nor does it promote removing low-risk parties without structured criteria. It also does not recommend manual jurisdiction-specific screening as a method of improving alert quality.

Reference from Sanctions and Compliance Domains:

Wolfsberg principles on management of reference data for sanctions screening.

Guidance on proper use and governance of "good guy lists."

Recommendations for ensuring alerts remain relevant, accurate, and risk-based.

NEW QUESTION # 48

If a financial institution's filtering system generates an alert matching a client to an individual on the Specially Designated National List, which investigation process should the financial institution follow?

- A. If the customer is an individual whose last name matches the alert, but whose first name does not match, the investigation should continue by contacting the customer for more information.
- B. If the customer is an individual with a match on the first and last name, and the country of birth, but not on the country of residence, then there is no need to proceed further with the investigation.
- C. If the customer is an unrelated company with the same name, there is no need to proceed further with an investigation.
- D. If the customer is a vessel with the same name, the investigation should continue to establish who is the owner of the vessel.

Answer: D

Explanation:

Sanctions screening standards require that when a hit is produced by the filtering system, the institution must determine whether the alert is a true match or a false positive through a structured escalation and investigation process. The Sanctions and Compliance Domains emphasize that financial institutions must evaluate all relevant identifiers, including entity type, name, ownership, vessel IMO numbers, and additional attributes.

In the case of vessels, sanctions regulations often target vessels by name and ownership, meaning that a vessel with an identical name requires deeper investigation. Authorities such as OFAC, the EU, and the UK regularly designate vessels because of their involvement in sanctioned activities, and vessel names frequently overlap with commercial entities. Therefore, the correct investigative approach is to continue the investigation to determine the true ownership, IMO number, and whether the vessel is the sanctioned party.

Options A, B, and C describe scenarios typically associated with clear mismatches or cases where additional investigation is unnecessary because essential identifiers do not match. However, vessels require continued review due to the regulatory emphasis on vessel ownership, registration, and operational control as determining factors in sanctions risk.

Reference from Sanctions and Compliance Domains:

Requirements for detailed matching processes in sanctions screening.

Guidance on evaluating entity type, ownership, and identifiers when reviewing alerts.

Rules relating to vessel sanctions, ownership determination, and verification steps.

Procedures for identifying true matches versus false positives in sanctions screening.

NEW QUESTION # 49

Why the First Circuit has imposed a Rule 11 sanction upon counsel in a "frivolous" habeas corpus proceeding?

- A. The petitioner sought the purely civil effect of preventing his deportation from happening.
- B. To district court for consideration of whether sanctions were appropriate
- C. Because sanctions are appropriate 'only in the most egregious circumstances and where the court has specifically found that penalties are necessary, that other remedies are insufficient and that its application of Rule 11 is tailored to the wrong found
- D. Petitioner was not pursuing traditional habeas relief
- E. Petitioner was pursuing traditional habeas relief

Answer: A,D

NEW QUESTION # 50

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