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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q89-Q94):

### NEW QUESTION # 89

In which way do notification and tipping-off differ?

- A. Tipping-off deprives a customer of legal defense while notification does not.
- B. Tipping-off is only relevant to financial institutions, whereas all entities with sanctions obligations must abide by notification requirements.
- C. Tipping-off assists law enforcement in its prosecution of entities, whereas notification assists subjects in their defense of prosecution.
- **D. Tipping-off is prohibited, and safeguards should be in place to prevent it, whereas notification is encouraged by regulators.**

**Answer: D**

Explanation:

Sanctions and Compliance Domains explain:

\* Tipping-off is prohibited, as it may alert a customer that they are under investigation, impairing regulatory or law-enforcement action. Institutions must implement controls to prevent it.

\* Notification, however, refers to permitted communication - such as informing a customer that their funds were frozen - when required or allowed by law (e.g., EU asset-freeze requirements), without revealing investigative details.

Tipping-off and notification serve entirely different purposes. Regulatory frameworks explicitly warn entities against tipping-off but do allow certain forms of notification that comply with legal obligations.

Reference:

Regulatory prohibition on tipping-off

Permitted customer notifications regarding asset freezes or legal procedures.

#### NEW QUESTION # 90

The legal counsel of a Canadian-based entity is drafting a contract in connection to selling goods to a legal entity client incorporated in Iran that operates in the financial sector of the Iranian economy. Which item should be addressed in the contract?

- A. Parties must commit to issue or receive all payments related to the contract via cross-border wire payments denominated in US
- B. Parties must commit to avoid mentioning or including any reference to Iran in financial transactions related to the contract.
- **C. Parties must commit that the transaction will be conducted in compliance with Canadian sanctions related to Iran.**
- D. Parties must commit to comply with EU operators' obligations outlined under the EU's blocking statute.

**Answer: C**

Explanation:

Canadian sanctions law requires that Canadian persons ensure all commercial dealings comply with Canadian sanctions regulations, including those concerning Iran. Contracts involving sanctioned countries must incorporate compliance clauses reflecting applicable Canadian law.

The EU Blocking Statute does not apply to Canadian entities. Avoiding references to Iran is ineffective and does not eliminate sanctions exposure. USD payments may introduce US sanctions exposure and are not advisable in this context.

Reference:

Canadian sanctions obligations under SEMA and related Iran regulations.

Requirement for legal compliance clauses in contracts involving sanctioned jurisdictions.

#### NEW QUESTION # 91

A shell company deceptively acquires equipment on behalf of the ultimate purchaser from a sanctioned country. This deceptive tactic includes:

- A. consolidation of goods.
- **B. concealment of the final destination.**
- C. sham divestment.
- D. reorganization of ownership interests.

**Answer: B**

Explanation:

Using a shell company to procure goods on behalf of a sanctioned end-user commonly involves concealing the true final destination. Sanctions and Compliance Domains describe this as a primary evasion technique in illicit procurement chains, where shell companies mask the ultimate recipient, shipment routing, and country of origin or destination.

Consolidation of goods and changes in ownership structure may occur in other schemes but the key deceptive tactic in this question is the concealment of the actual final destination.

Reference:

Illicit procurement and diversion typologies involving shell companies.

Concealment of end-users and destination as a sanctions evasion indicator.

#### NEW QUESTION # 92

North Korea's campaign to become a nuclear power first became apparent in March 1993, when it announced that it was withdrawing from a treaty.

Which of the following treaty is this?

- A. Treaty on the Prohibition of Nuclear Weapons
- **B. Nuclear Non-Proliferation Treaty (NPT)**
- C. Intermediate-Range Nuclear Forces Treaty - INF
- D. Strategic Arms Limitation Treaty I (Interim Agreement)
- E. Ballistic Missile Launch Notification Agreement

**Answer: B**

### NEW QUESTION # 93

Which of the following could affect the pursuit and implementation of incentive policies?

- A. National Struggle
- B. Factional struggle
- C. Partisan struggle
- D. Institutional struggle
- E. Individual Struggle

**Answer: B,C,D**

### NEW QUESTION # 94

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