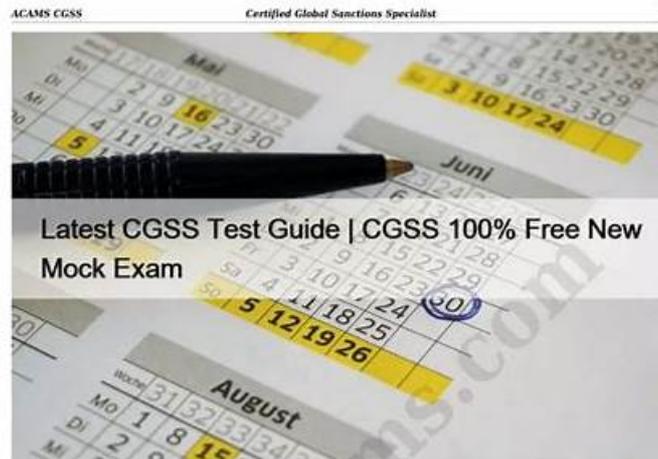


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ACAMS Certified Global Sanctions Specialist Sample Questions (Q84-Q89):

NEW QUESTION # 84

According to the assessment of Humanitarian vulnerability, the following are often more vulnerable, may be discriminated against and have lower incomes except?

- A. Disadvantaged ethnic groups
- B. Refugees
- C. The elderly
- D. The poor
- E. The disabled

Answer: E

NEW QUESTION # 85

Rule 11 is not directly applicable to administrative proceedings.

Which of the following is related to this circumstance?

- A. *Nuwesra v. Merrill Lynch, Fenner & Smith, Inc.*, 174 F.3d 87 (2d Cir. 1999), the Second Circuit vacated the district court's sua sponte award of \$25,000 in attorneys' fees to the defendants in an ADA case.
- B. *Whelan v. Heffler, Radetich & Saitta, LLP*, No. 3:99-CV-0337-P, 1999 U.S. Dist. LEXIS 15979, at *20 (N.D. Tex. Oct. 13, 1999) - Lifetime permanent injunction enjoining attorney from local bankruptcy practice was excessive.
- C. *Chalais v. Milton Bradley Co.*, No. 95 Civ. 0737 (MBM), 1996 U.S. Dist. LEXIS 13438, at *7 (S.D.N.Y. Sept. 16, 1996) - "[I]mpecunious individual practitioners are just as capable of generating unnecessary work as wealthy firms, and they are no less bound by the rules."
- D. *Lorentzen v. Anderson Pest Control*, 64 F.3d 327, 330 (7th Cir. 1995) - Upholding sanctions award of fees where "only a substantial monetary sanction would deter [the sanctioned party] from engaging in similar conduct in the future".
- E. *TriState Steel Constr. Co. v. Herman*, 164 F.3d 973, 979 (6th Cir. 1999) - Proceeding before the Occupational Safety-Health Review Commission

Answer: E

NEW QUESTION # 86

Which action must be taken when investigating a potential match on a client?

- A. Include the regulatory documentation on the CDD
- B. Perform CDD to maintain details on the customer relationship.
- C. Include products and services on the CDD
- D. Conduct an analysis to determine if the match is a true match.

Answer: D

Explanation:

When a potential sanctions match is detected, the required first action is to determine whether the alert represents a true match or a false positive. This involves comparing identifiers, reviewing customer documentation, and gathering additional details.

CDD is important but is not the specific required action at the moment of match investigation. The priority is confirming whether the entity is indeed the sanctioned party.

Reference:

Sanctions investigation protocols requiring confirmation of match status.

Distinction between CDD and sanctions-specific investigations.

NEW QUESTION # 87

A financial institution requests documents from a client who is involved in a trading business. Upon receiving the documents, which might be a potential indicator of sanctions evasion? (Select Three.)

- A. Falsified documents related to shipping routes taken
- B. Shipping instructions that include docking at countries located far from sanctioned territories
- C. Conflicting documentation related to the final user of goods traded
- D. Numerous amendments to a trade agreement that obscure the entities involved
- E. Payment instructions of the customer are made online
- F. A customer's account statement from another bank shows several cash withdrawals

Answer: A,C,D

Explanation:

Sanctions evasion indicators in trade documentation include:

* Multiple amendments designed to obscure the parties involved - a classic red flag indicating concealment of the real counterparty.

* Falsified or tampered shipping documents - used to hide sanctioned routes, ports, or vessels.

* Conflicting end-user documentation - a major warning sign of diversion or concealment of sanctioned recipients.

Cash withdrawals (E) and online payment instructions (F) are AML indicators, but not directly sanctions evasion indicators. Docking at non-sanctioned countries (D) is not suspicious unless used as part of concealment, which is not indicated here.

Reference:

Trade-based sanctions evasion red flags (altered documents, falsification, inconsistent end-user information).

Diversion and concealment indicators in trade compliance.

NEW QUESTION # 88

How do you define an "Indicator" in Humanitarian indicators and data sources:

- A. A variable that provides strength to a proposition
- B. Voting procedure for a sanction to be proposed
- C. Measurable variable and that which sheds light on another variable of interest
- D. A variable of data sources
- E. Proposition provided by the UN

Answer: C

NEW QUESTION # 89

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