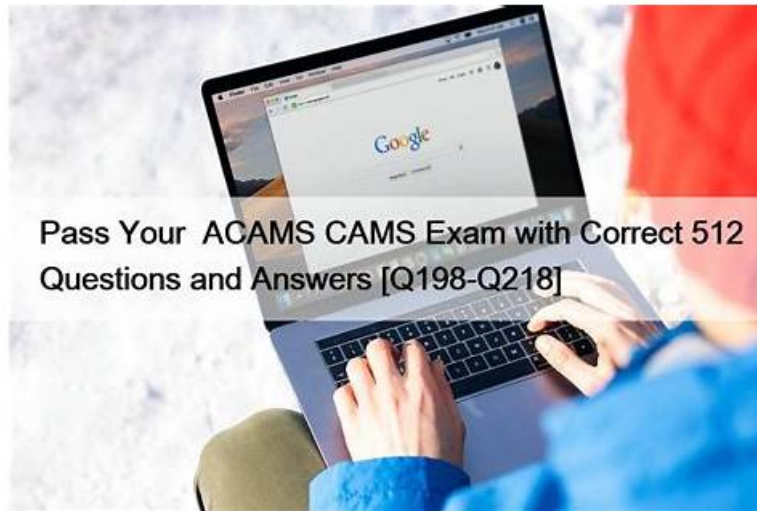


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## ACAMS Certified Anti-Money Laundering Specialists (the 6th edition) Sample Questions (Q257-Q262):

### NEW QUESTION # 257

the Financing of Terrorism (CFT)]

The AML investigator is reviewing the transaction monitoring alerts and the customer's historical profile for the past two years. A review of the negative news search from a blog indicates that the customer was previously part of a terrorist group. Which activities warrant further escalation? (Select Two.)

- A. The customer conducts multiple cash transactions on a regular basis which do not match the customer's occupation.
- B. The credit transactions in the account relate mostly to salary and rental income from property.
- C. The customer has bought and sold several real estate properties over the last year.
- D. The account received a large cash deposit followed by systematic automated teller machine (ATM) withdrawals until the balance was nominal.
- E. The customer remitted monies in several transactions to the account of a recognized charity non-profit organization.

**Answer: A,D**

Explanation:

1. D. The account received a large cash deposit followed by systematic automated teller machine (ATM) withdrawals until the balance was nominal.

This pattern of behavior, known as "structuring" or "smurfing," is often associated with money laundering.

The large cash deposit followed by smaller withdrawals in a systematic manner raises red flags and requires further investigation.

2. E. The customer conducts multiple cash transactions on a regular basis which do not match the customer's occupation. Conducting frequent cash transactions that do not align with the customer's stated occupation or income source is suspicious. It suggests potential attempts to hide the true origin of funds or evade reporting requirements<sup>1</sup>.

D: Large Cash Deposit Followed by ATM Withdrawals:

The large cash deposit followed by systematic ATM withdrawals is indicative of structuring, a common money laundering technique. Structuring involves breaking down large sums of money into smaller transactions to avoid detection. In this case, the customer's behavior warrants further scrutiny to determine the purpose behind these transactions.

E: Inconsistent Cash Transactions:

When a customer conducts multiple cash transactions that do not align with their stated occupation or income source, it raises suspicions. Such behavior may indicate an attempt to obscure the true origin of funds or evade reporting requirements. Investigating the reasons behind these inconsistent cash transactions is essential to assess potential money laundering risks<sup>1</sup>.

References: 1: Anti-Money Laundering Specialist (6th edition), ACAMS, Chapter 3: "Money Laundering and Terrorist Financing Methods," Section 3.1.2: "Structuring," and Section 3.1.3: "Inconsistent Cash Transactions."

### NEW QUESTION # 258

One key aspect of promoting an enterprise-wide compliance culture within a financial institution (FI) is that the:

- A. first line of defense should establish its own policies independently.
- **B. relevant information should be shared throughout the organization.**
- C. revenue generating business sectors should have precedence over compliance.
- D. cost of compliance should increase proportionately to revenues.

**Answer: B**

Explanation:

An enterprise-wide compliance culture is a centralized, coordinated approach to ethics and compliance program design and assessment that cuts across multiple business units within an organization<sup>1</sup>. One key aspect of promoting such a culture is that the relevant information should be shared throughout the organization, so that all employees are aware of the compliance risks, policies, procedures, and expectations, and can act accordingly<sup>2</sup>. Sharing information also facilitates collaboration, communication, and feedback among different functions and levels of the organization, and helps identify and address any gaps or issues in the compliance program<sup>3</sup>. By contrast, the other options are not conducive to an enterprise-wide compliance culture, as they either create silos, conflicts, or inefficiencies in the compliance function.

1: Enterprise Compliance Risk Management Services | Deloitte US

2: Enterprise Risk Management and Risk Culture - McKinsey & Company

3: FRB: Speech, Bies-Enterprise-wide Compliance Programs-February 4, 2004 Reference:

[https://www.ifc.org/wps/wcm/connect/e7e10e94-3cd8-4f4c-b6f8-1e14ea9eff80](https://www.ifc.org/wps/wcm/connect/e7e10e94-3cd8-4f4c-b6f8-1e14ea9eff80/45464_IFC_AML_Report.pdf?MOD=AJPERES&CVID=mKKNshy(51)

[/45464\\_IFC\\_AML\\_Report.pdf?MOD=AJPERES&CVID=mKKNshy\(51\)](https://www.ifc.org/wps/wcm/connect/e7e10e94-3cd8-4f4c-b6f8-1e14ea9eff80/45464_IFC_AML_Report.pdf?MOD=AJPERES&CVID=mKKNshy(51)

### NEW QUESTION # 259

A financial institution has expanded its scope of services so that it is attracting the business of politically exposed persons (PEPs) who had previously never been part of the customer base.

Which two courses of action should the compliance officer include in the institution's procedures for considering PEPs as customers? (Choose two.)

- A. Expedite due diligence when a PEP is pre-approved by a member of senior management
- **B. Take adequate measures to establish the source of wealth and source of funds which are involved in the business relationship or occasional transaction**
- C. Obtain appropriate senior management approval for establishing a business relationship with a PEP from a high risk country
- **D. Conduct enhanced ongoing monitoring of the business relationship**

**Answer: B,D**

Explanation:

According to the Anti-Money Laundering Specialist (the 6th edition) resources, PEPs are individuals who are or have been entrusted with prominent public functions, such as heads of state, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, or important political party officials<sup>1</sup>. PEPs pose a higher risk of money laundering and corruption due to their position and influence<sup>2</sup>. Therefore, financial institutions should apply enhanced due diligence and ongoing monitoring measures when dealing with PEPs as customers<sup>3</sup>. This includes:

Conducting enhanced ongoing monitoring of the business relationship to detect and report any suspicious transactions or activities<sup>4</sup>. This may involve more frequent reviews, higher-level approvals, or increased documentation of the transactions and the rationale behind them.

Taking adequate measures to establish the source of wealth and source of funds which are involved in the business relationship or occasional transaction. This may involve verifying the origin, legitimacy, and purpose of the funds, as well as the economic activities and assets of the PEP.

The other two options are incorrect because:

Expedite due diligence when a PEP is pre-approved by a member of senior management is not a recommended course of action, as it may compromise the quality and integrity of the due diligence process. Pre-approval by senior management does not exempt the financial institution from conducting thorough and timely due diligence on the PEP and the business relationship.

Obtain appropriate senior management approval for establishing a business relationship with a PEP from a high risk country is a necessary but not sufficient course of action, as it does not address the ongoing monitoring and source of funds aspects of the PEP risk management. Senior management approval is required for establishing or continuing a business relationship with a PEP, regardless of the country of origin or residence of the PEP.

Reference:

1: ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 83 2: ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 84 3: ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 85 4: ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 86 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 87 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 86 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 87 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 88 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 88 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 88 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 88

### NEW QUESTION # 260

The primary objectives of the United Nations in developing sanctions regimes include: (Select Three.)

- A. to deter non-democratic and non-constitutional changes within countries.
- B. to support the protection of human rights.
- C. to support governments and regimes in the peaceful resolution of conflict.
- D. to punish governments for having weak financial crime controls.
- E. to force developing nations to adopt liberal or substantive democracies.

**Answer: A,B,C**

Explanation:

UN sanctions regimes are not punitive but aim to:

\* B: "Support peaceful resolution of conflicts."

\* D: "Deter non-democratic and unconstitutional changes of government."

\* E: "Promote respect for human rights and humanitarian law." (CAMS 6th Edition, United Nations Sanctions; UN Security Council Mandates) Incorrect:

\* A: The UN does not impose sanctions to force regime type.

\* C: Sanctions are not for punishing weak AML controls.

References:

CAMS 6th Edition, UN Sanctions

UN Security Council, Sanctions Objectives

### NEW QUESTION # 261

Which of the following processes or tools contribute to AML compliance despite being seemingly unrelated?

(Choose two.)

- A. Customer support ticket tracking
- B. Customer satisfaction surveys
- C. Customer loyalty program tracking

- D. Product usage analysis
- E. Credit risk assessment

Answer: C,D

Explanation:

Customer loyalty program tracking and product usage analysis can uncover unusual patterns or behaviors that deviate from expected norms. These insights may help detect suspicious activity or hidden risks, making them valuable tools for supporting AML compliance even if not directly linked to traditional monitoring systems.

## NEW QUESTION # 262

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