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## **ACAMS Certified Anti-Money Laundering Specialists (the 6th edition) Sample Questions (Q774-Q779):**

### **NEW QUESTION # 774**

An auction house dealing in fine art and antiques sells a well-known painting at a price of \$12 million to an agent bidding for a group of local investors. The same painting sold ten years prior at auction for \$5 million.

The auction house receives payment for the painting via wire transfer from an account maintained in an offshore jurisdiction by the investor group. No beneficial ownership information is available for the account.

What are the two money laundering red flags? (Choose two.)

- A. An agent bids on the painting for a group of investors.
- B. Lack of beneficial ownership details for the originating account.
- C. Payment is received from an account in an offshore jurisdiction.
- D. The painting has more than doubled its value in ten years.
- E. The payment is received via wire transfer.

### **Answer: B,C**

Explanation:

The payment received from an account in an offshore jurisdiction and the lack of beneficial ownership details for the originating account are two money laundering red flags. Offshore jurisdictions are often used by money launderers to hide the source and destination of their funds, as they typically have low transparency and weak regulatory oversight. The absence of beneficial ownership information makes it difficult to identify the true owners and controllers of the funds, and to assess the legitimacy and risk of the transaction. These factors increase the possibility that the payment is related to money laundering, tax evasion, or other illicit activities.

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ACAMS CAMS Certification Study Guide, 6th Edition, page 33

ACAMS CAMS Certification Exam Outline, 6th Edition, Domain 1, Task 1.2

ACAMS CAMS Certification Video Training Course, Module 1, Lesson 1.2

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 315

### **NEW QUESTION # 775**

The manager of a bank's KYC team discovers that a high-risk customer's activity was not reviewed last quarter as required by the bank's internal compliance schedule.

What should the KYC team manager do?

- A. Submit a referral to file a Suspicious Activity Report (SAR).
- B. Remove the customer from the bank's high-risk list.
- C. Evaluate the KYC review process to understand why the review did not occur as required and take corrective action as necessary.
- D. Contact the customer's relationship manager to suspend account access until the periodic KYC review is completed.

### **Answer: C**

Explanation:

Regular KYC reviews ensure that high-risk customers are monitored for potential changes in their risk profile.

Option D (Correct): The KYC manager must determine why the required review was missed and implement corrective measures to prevent future failures.

Option A (Incorrect): A missed review does not necessarily indicate suspicious activity, so filing a SAR at this stage is not appropriate.

Option B (Incorrect): Removing a customer from the high-risk list without reassessment is a compliance violation.

Option C (Incorrect): Suspending account access without due process may be legally questionable.

Best Practices for KYC Compliance Management:

Ensure automated KYC review tracking to avoid missed reviews.

Conduct risk-based periodic reviews on high-risk customers.

Implement escalation protocols for overdue KYC reviews.

Reference:

FATF Recommendation 10 (Customer Due Diligence)  
6th EU AML Directive (6AMLD) on Periodic KYC Reviews  
Wolfsberg Group Guidance on KYC Risk Management

### NEW QUESTION # 776

The anti-money laundering compliance officer for a small money transmitter has several agent locations in the same geographic area in the United States. The customers are immigrants from Country A and the majority of the funds are remitted to Country A.

In a meeting with one of the agents, it is recently discovered that two new customers have been coming in three times a week and sending funds to the same recipient in Country B. Each cash transaction always totals exactly \$8,000.

What should alert the agent to possible money laundering activity by the two customers?

- A. They have been coming in three times a week
- B. It is unusual for customers to remit to Country B
- C. Each of their transactions is just below the cash reporting threshold
- D. They remit funds to the same person

**Answer: C**

Explanation:

This involves breaking down large amounts of cash into smaller transactions that are below the reporting threshold of \$10,000 in the United States, in order to avoid detection and reporting by the financial institution. Structuring is a red flag for money laundering and should be reported to the authorities as a suspicious activity. The other options are not necessarily indicative of money laundering, as they could have legitimate explanations. For example, the customers may have a family or business connection to the same recipient in Country B, or they may have a regular need to send money three times a week.

Reference:

ACAMS CAMS Certification Video Training Course, Chapter 2: Money Laundering Risks and Methods, Section 2.2: Common Money Laundering Techniques Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 91 CAMS Certification Package - 6th Edition, Study Guide, Chapter 2: Money Laundering Risks and Methods, Page 38

### NEW QUESTION # 777

What three attributes do havens for money laundering and terrorist financing typically have? Choose 3 answers

- A. Little enforcement of the laws, weak penalties or provisions that make it difficult to confiscate or freeze assets related to money laundering
- B. Limited types of institutions and persons covered by money laundering laws and regulations
- C. Absence of an effective FIU
- D. A large number of predicate crimes for money laundering

**Answer: A,B,C**

Explanation:

Havens for money laundering and terrorist financing are jurisdictions that offer a high degree of anonymity, secrecy, and protection to criminals who seek to conceal or move their illicit funds. These havens typically have the following three attributes<sup>12</sup>:

Limited types of institutions and persons covered by money laundering laws and regulations. This means that only a narrow range of financial activities or entities are subject to anti-money laundering (AML) and combatting the financing of terrorism (CFT) obligations, such as customer due diligence, record-keeping, reporting, and supervision. For example, some havens may exclude lawyers, accountants, trust and company service providers, or non-bank financial institutions from AML/CFT requirements.

Little enforcement of the laws, weak penalties or provisions that make it difficult to confiscate or freeze assets related to money laundering. This means that the authorities in these havens lack the political will, resources, or capacity to effectively implement and enforce the AML/CFT laws and regulations. They may also impose low sanctions or fines for non-compliance, or create legal barriers or obstacles for the confiscation or freezing of assets that are the proceeds of, or used in, or intended or allocated for use in, money laundering, terrorist financing, or other crimes.

Absence of an effective FIU. This means that these havens do not have a central agency that is responsible for receiving, analyzing, and disseminating financial intelligence related to money laundering, terrorist financing, and other crimes. An effective FIU is essential for facilitating domestic and international cooperation and information exchange, as well as for supporting investigations and prosecutions of money laundering and terrorist financing cases.

Reference:

1: The IMF and the Fight Against Money Laundering and Terrorism Financing, 1 2: IX Special Recommendations, 2

### NEW QUESTION # 778

Historically, a tour guide has made monthly cash deposits averaging \$10,000. Over the past three months, the monthly deposits have averaged \$100,000. When the financial institution QUESTIO N N O is the increased deposits, the tour guide explains that there have been numerous conventions in town so business has increased substantially.

Which further action(s) should the financial institution take?

- A. Perform further investigation, if appropriate report the activity to the authorities and consider terminating the relationship
- B. Immediately terminate the relationship
- C. Perform further investigation, if appropriate report the activity to the authorities and place a limit on future transactions
- D. Schedule a periodic review of activity

**Answer: A**

Explanation:

The financial institution should perform further investigation to verify the legitimacy of the tour guide's explanation and the source of funds. If the investigation reveals any suspicious or unusual activity, such as inconsistent cash flow patterns, involvement of high-risk customers or jurisdictions, or indications of money laundering or terrorist financing, the financial institution should report the activity to the authorities and consider terminating the relationship. The financial institution should also document the investigation and its findings, and update the customer's risk profile accordingly.

References:

CAMS Study Guide - 6th Edition, Chapter 4, page 112

CAMS Certification Exam Outline, Domain 1, Task 1.2, Skill 1.2.2

ACAMS MoneyLaundering.com, Article: "How to Conduct Effective Customer Due Diligence"

### NEW QUESTION # 779

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