

# [2026] ACAMS CGSS Questions: Fosters Your Exam Passing Skills

## ACAMS PRACTICE TEST EXAM QUESTIONS WITH CORRECT ANSWERS 2025/2026

Which of the following is the most common method of laundering money through a legal money services business? - ANSWER- Purchasing structured money instruments

In general, the 3 phases of money laundering are said to be: Placement; - ANSWER- Layering and integration

Which statement is true? - ANSWER- Bust-out schemes are popular in creating large bankruptcy frauds where businesses secure increasing loans in excess of the actual value of the company or property and then run with the money. Leaving the lender to foreclose and take a substantial loss

Which 3 of the following is an indication of possible money laundering in an insurance industry scenario? - ANSWER- -Single-premium insurance bonds, redeemed at a discount  
-Policyholders who are unconcerned about penalties for early cancellation  
-Policyholders who make full use of the "free look" period

Which 2 activities are typically associated with the black market peso exchange (BMPE) money laundering system? - ANSWER- -Converting illicit drug proceeds from dollars or Euros to Colombian pesos  
-Facilitating purchases by Colombian importers of goods manufactured in the United States or Europe through peso brokers

What is the Right of Reciprocity in the field of international cooperation against money laundering? - ANSWER- A rule in the law of a country allowing its authorities to cooperate with authorities of other countries to the degree that their law allows them to do the same

The greatest risk for money laundering is for casinos that - ANSWER- Allow customers with credit balances to withdraw funds by check in another jurisdiction

Which statement is true regarding the risk of Politically Exposed Persons (PEPs)? - ANSWER- PEPs have significantly greater exposure to the politically corrupt funds, including accepting bribes or misappropriating government funds

Dirty money, derived from criminal activities of Belgian Criminal A, is sent to a foreign bank account of Corporation B. Then in Belgium, a new investment Company C is incorporated. Criminal A is appointed as a director of Company C. Company C borrows money from the foreign Company B and buys real estate in Belgium. The real estate is rented to third parties. Director (Criminal) A also rents an apartment in the building

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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q78-Q83):

### NEW QUESTION # 78

What element should be included in an effective export compliance program to address sanctions risk?

- A. Outsourcing to freight forwarders who have excellent expertise and guidance
- B. Implementing letters of credit containing prohibited boycott terms or conditions
- C. Collecting of vouchers
- D. **Conducting payment screening according to formalized procedures**

**Answer: D**

Explanation:

An effective export compliance program must include formalized and documented screening procedures, including payment screening, trade documentation screening, and counterparty checks. This ensures compliance with sanctions, export restrictions, and embargo requirements.

Freight forwarders may assist but do not replace internal compliance responsibilities. Boycott-related terms must be avoided, and collecting vouchers is not an export controls safeguard.

Reference:

Export controls compliance requirements for systematic sanctions screening.

Internal control expectations for export transactions.

### NEW QUESTION # 79

In which scenarios will the Office of Foreign Assets Control's 50% Rule apply to Entity C? (Select Three.)

- A. Blocked Person X owns 50% of Entity A and 50% of Entity B. Entities A and B own 25% of Entity C each.
- B. Blocked Entity A owns 49.99% of Entity B. Entity B owns 49.99% of Entity C.
- C. **Blocked Person X owns 50% of Entity A. Entity A owns 50% (1 share) of Entity C. Blocked Person X owns 1 share directly in Entity C.**
- D. Blocked Person X owns 50% of Entity A and 25% of Entity B. Entities A and B each own 25% of Entity C.
- E. **Blocked Person X owns 50% (1 share) of Entity A. Entity A owns 50% (1 share) of Entity B. Entity B owns 50% (1 share) of Entity C.**
- F. **Blocked Entity A owns 50% of Entity B. Entity B owns 50% of Entity C.**

**Answer: C,E,F**

Explanation:

The OFAC 50% Rule states:

\* Any entity owned 50% or more - directly or indirectly - by an SDN or SDN-owned entity is itself automatically blocked.

\* Ownership is cumulative through all tiers.

Apply the rule:

- ✓ A - Blocked Person X has direct + indirect ownership in Entity C exceeding 50% → Blocked.
- ✓ C - Ownership cascades: SDN → A → B → C; each at 50%. Result: Entity C is blocked.
- ✓ D - Blocked Entity A (>50%) → owns B (>50%) → owns C (>50%). All downstream entities are blocked.

Not blocked:

\* B = 25% + 25% = 50% but SDN does not directly own A or B - the SDN owns A and B, but A and B each are not blocked themselves because ownership is not aggregated across separate entities unless they hold shares. Therefore, C is not blocked.

\* E = Only 25% flows into Entity C.

\* F = Neither ownership chain reaches 50%.

Reference:

OFAC 50% Rule on direct and indirect ownership.

OFAC guidance on cascading ownership and aggregation requirements.

### NEW QUESTION # 80

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

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

#### Answer: A

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 # 81

An entity not listed by the Office of Foreign Assets Control is attempting to open a bank account in the US. During the screening process, an employee learns that the entity's ownership exceeds the 50% aggregate Specially Designated National ownership threshold. How should the employee proceed?

- A. Request that the customer alters the ownership percentage to enable them to open the account.
- B. Obtain senior management approval to proceed with the account opening.
- C. Reject or decline the account opening and add the entity name to the internal watch list to avoid further business activity.
- D. Authorize the account opening as this entity is not considered to be restricted.

#### Answer: C

Explanation:

Under OFAC's 50 Percent Rule, any entity that is owned 50% or more-individually or in aggregate-by one or more Specially Designated Nationals (SDNs) is considered automatically blocked, even if not explicitly listed.

Financial institutions must treat such entities as if they are SDNs. Therefore, the account cannot be opened. Senior management approval cannot override OFAC regulations, and altering ownership to bypass sanctions is prohibited facilitation.

Reference:

OFAC 50 Percent Rule and automatic blocking requirements.

Prohibition on opening accounts or facilitating transactions for SDN-owned entities.

### NEW QUESTION # 82

Which of the following is needed to pay salary and related expenses to the designated person?

- A. OFSI license
- B. A lawyer's permission.
- C. Frozen account
- D. Bank permission
- E. His salary account.

#### Answer: A

### NEW QUESTION # 83

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