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ACAMS Certified Global Sanctions Specialist Sample Questions (Q60-Q65):

NEW QUESTION # 60

Which statement best describes the difference between the requirements for calculating beneficial ownership for sanctions due diligence (SDD) and calculating beneficial ownership for AML in the US?

- A. AML requirements identify a beneficial owner as a person who owns more than 20% of a legal entity, whereas the Office of Foreign Assets Control applies a higher threshold to legal entity ownership for SDD.
- B. AML requirements identify a beneficial owner as a person who owns more than 50% of a legal entity, whereas the Office

- of Foreign Assets Control applies the 25% Rule to legal entity ownership for SDD.
- C. AML requirements identify a beneficial owner as a person who owns more than 51% of a legal entity, whereas the Office of Foreign Assets Control applies the 25% Rule to legal entity ownership for SDD.
- **D. AML requirements identify a beneficial owner as a person who owns more than 25% of a legal entity, whereas the Office of Foreign Assets Control applies the 50% Rule to legal entity ownership for SDD.**

Answer: D

Explanation:

US AML requirements (such as the Customer Due Diligence Rule) define a beneficial owner as an individual who owns 25% or more of a legal entity. OFAC, however, applies the 50% Rule for sanctions due diligence: an entity is considered owned by a sanctioned person if the designated person holds, individually or collectively, 50% or more of the entity.

The AML 25% standard is not used for determining whether an entity is treated as sanctioned; instead, OFAC's ownership threshold is fixed at 50%. The correct distinction is the difference between AML's 25% threshold and OFAC's 50% Rule.

Reference from Sanctions and Compliance Domains:

Beneficial ownership thresholds under US AML customer due diligence rules.

OFAC's 50% Rule for sanctions ownership determinations.

NEW QUESTION # 61

What caused the de-risking of banks for humanitarian sanctions?

- A. UNs disapproval
- B. United States disapproval
- **C. Insurance and safety**
- **D. Hurdle during online payments**
- E. Civil not allowing imports to their country

Answer: C,D

NEW QUESTION # 62

Which of the following is included under article 30 of UN sanction?

- A. The article states that the Council is thus required to act in accordance with UN Purposes and Principles.
- **B. The article empowers the Council to adopt its own rules of procedure.**
- C. The article states the power to establish subsidiary organs to facilitate the Council's work.
- D. The article places a binding legal obligation upon states to implement the Council's sanctions decisions.
- E. It provides that any state confronted by 'special economic problems' arising from the application of UN sanctions has the right to consult the Council.

Answer: B

NEW QUESTION # 63

There are three types of PBE: isolation, pooling, and semi-separation. In which category of PBE do the two forms of actor give the same signal?

- A. Non-pooling equilibria
- B. Separating equilibria
- C. Semi-separating equilibria
- **D. pooling equilibria**
- E. None of the above

Answer: D

NEW QUESTION # 64

An entity that engages in a transaction under a general license issued by the Office of Foreign Assets Control (OFAC) must: (Select Two.)

- A. apply to OFAC for a specific license to clarify the conditions.
- **B. be sure other conditions comply with relevant sanctions.**
- C. issue a suspicious activity report.
- D. be sure the transaction is only related to agriculture and medicine.
- **E. be sure the transaction is within the scope of the general license.**

Answer: B,E

Explanation:

Under OFAC regulations, when using a general license:

* The entity must ensure the transaction strictly complies with all conditions in the general license.

* The entity must ensure the activity falls within the scope of the general license.

A general license functions as pre-authorization. If the transaction satisfies its terms, no specific license is needed.

General licenses are not limited only to agricultural or medical activities-those are examples, not universal rules. Suspicious activity reports are not automatically required unless there is separate AML suspicion.

Reference:

OFAC rules governing the use and scope of general licenses.

Compliance obligations for authorized activities.

NEW QUESTION # 65

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