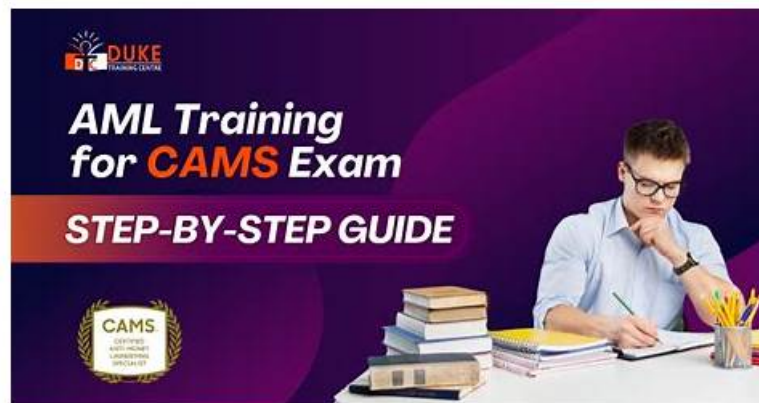


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ACAMS Certified Anti-Money Laundering Specialists (the 6th edition) Sample Questions (Q731-Q736):

NEW QUESTION # 731

A senior government official is trying to open an account in a financial institution (FI) that operates in a different country from where the official is domiciled. The official is using an asset manager intermediary to represent them. According to the Wolfsberg Group, which next steps should the FI take regarding the opening of the account? (Select Three.)

- A. Determine whether the intermediary representative is acting on the officer's behalf.
- B. Ensure the official's client file is updated so that the information is maintained in a consistent and complete manner.
- C. Reasonably establish if the source of wealth and funds of the official is legitimate.
- D. Report to authorities that a possible suspicious activity is being undertaken by a politically exposed person.
- E. Perform due diligence procedures on the managing intermediary.
- F. Screen for applicable sanctions only for the official in the name of the person for whom the account will be opened.

Answer: A,C,E

Explanation:

According to the Wolfsberg Group, the FI should take the following steps regarding the opening of the account for the senior government official:

Reasonably establish if the source of wealth and funds of the official is legitimate. This is to ensure that the FI is not facilitating the laundering of proceeds of corruption, bribery, or other illicit activities by the official, who is considered a politically exposed person (PEP) and poses a higher risk of financial crime. The FI should obtain information and documentation on the origin and ownership of the funds, the official's income and assets, and the purpose and expected activity of the account¹².

Perform due diligence procedures on the managing intermediary. This is to verify the identity, reputation, and regulatory status of the intermediary, who acts as a third party on behalf of the official. The FI should also assess the intermediary's own AML/CFT policies and controls, and the nature and extent of the relationship between the intermediary and the official¹³.

Determine whether the intermediary representative is acting on the officer's behalf. This is to establish the beneficial ownership and control of the account, and to avoid any potential conflicts of interest or undue influence by the intermediary. The FI should obtain a written confirmation from the intermediary that they are authorized to act on behalf of the official, and that they will disclose any changes in the beneficial ownership or control of the account¹³.

Reference:

- 1, Wolfsberg Group, Guidance on Politically Exposed Persons (PEPs), 2023
- 2, Wolfsberg Group, FAQs on Source of Wealth (SoW) & Source of Funds (SoF), 2023
- 3, Wolfsberg Group, FAQs on Intermediaries, 2023

NEW QUESTION # 732

During a law enforcement investigative interview regarding potential money laundering, the suspect starts making assertions and statements that the investigator believes are false.

How should the investigator respond?

- A. Advise the suspect that the interview will be terminated if there is suspicion of deception
- B. Inform the suspect that deception is obvious and continue the interview
- **C. Ask question of a material nature about the suspected false statements without revealing the suspected deception**
- D. Direct the interview in another direction until there is better rapport before returning back to the troubling question

Answer: C

Explanation:

QUE According to the ACAMS Study Guide, one of the skills of an effective AML investigator is to conduct investigative interviews using appropriate techniques and methods¹. One of the techniques is to use open-ended questions that elicit detailed responses from the interviewee, and to avoid leading or suggestive questions that may reveal the investigator's assumptions or suspicions¹. Therefore, the best option is to ask question of a material nature about the suspected false statements without revealing the suspected deception, as this would allow the investigator to gather more information and evidence, and to test the consistency and credibility of the interviewee's answers.

The other options are not advisable or effective, because:

- * A. Informing the suspect that deception is obvious and continuing the interview is not a good strategy, because it may antagonize the suspect and make them less cooperative or more defensive. It may also alert the suspect to the investigator's knowledge and sources, and give them an opportunity to change or modify their story².
- * B. Advising the suspect that the interview will be terminated if there is suspicion of deception is not a good strategy, because it may create a negative impression of the investigator and the investigation, and it may discourage the suspect from providing any useful information. It may also imply that the investigator has insufficient evidence or authority to pursue the case².
- * C. Directing the interview in another direction until there is better rapport before returning back to the troubling question is not a good strategy, because it may waste time and resources, and it may lose the focus and momentum of the investigation. It may also signal to the suspect that the investigator is not confident or competent, and it may give the suspect a chance to prepare or rehearse their answers².

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1: ACAMS Study Guide, 6th Edition, Chapter 4: Conducting and Supporting the Investigation, page 105. 2: 46 AML Investigator Interview Questions (And Sample Answers)

NEW QUESTION # 733

What are two requirements for monitoring and reporting suspicious activity for correspondent banking according to the Wolfsberg Principles? (Choose two.)

- A. Investigate and report suspicious activity only for the correspondent bank's clients

- B. Utilize downstream correspondents to investigate and report suspicious activity
- C. Incorporate suspicious activity monitoring into periodic reviews
- D. Incorporate due diligence results such as customer risk ratings

Answer: C,D

NEW QUESTION # 734

According to the Basel Committee principles, which actions would make a customer identification program at a bank more robust? (Select Two.)

- A. Understanding why a customer has selected a particular financial institution for banking.
- B. Understanding the nature and purpose behind a new business opening an account at the bank.
- C. Limiting the online activities of a new customer during the first two months.
- D. Verifying the identity of a customer with reputable online source documentation.

Answer: A,B

Explanation:

A robust customer identification program is critical in preventing money laundering and financial crime.

Option B (Correct): Understanding the nature and purpose of a customer's business helps banks assess the legitimacy of financial activity and identify potential risks.

Option D (Correct): Understanding why a customer selects a particular bank provides insights into possible risk factors, such as jurisdictional concerns or access to certain financial instruments.

Option A (Incorrect): Limiting online activities is not a standard CDD (Customer Due Diligence) measure. Risk-based controls are applied but do not involve blanket restrictions.

Option C (Incorrect): While online verification is useful, in-person or government-sourced verification is preferred.

NEW QUESTION # 735

Bank A is located in Country A.

A wire transfer from Bank B located in Country B is processed by Bank A, where the funds are being moved to a customer at Bank C located in Country C.

The wire transfer is deemed suspicious by Bank A.

Who should Bank A file a suspicious transaction report on?

- A. Bank B in Country A
- B. The transaction in Country B
- C. Bank C in Country C
- D. The transaction in Country A

Answer: D

NEW QUESTION # 736

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