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## ACAMS Certified Anti-Money Laundering Specialists (the 6th edition) Sample Questions (Q450-Q455):

### NEW QUESTION # 450

The compliance department receives an internal referral that appears to indicate terrorist financing. What is the first step that should be taken in the investigation process?

- A. Notify the Board of Directors.
- B. Exit the relationship.
- C. Gather background and transaction information.
- D. Immediately file a suspicious activity report.

**Answer: C**

Explanation:

According to the 6th edition Certified Anti-Money Laundering Specialist Study Guide, when the compliance department receives an internal referral that appears to indicate terrorist financing, the first step in the investigation process should be to gather background and transaction information. This includes obtaining customer identification and verifying customer data, obtaining additional information about the customer and the transaction, and reviewing the transaction activity. This information will help to determine if the referral is accurate and if further action is needed.

#### NEW QUESTION # 451

Which is an example of structuring with regards to money laundering?

- A. A person deposits 100,000 USD in cash at a bank.
- **B. A person deposits substantial sums of currency into a number of local branches by making several cash transactions of less than 10,000 USD.**
- C. A person deposits a large amount of more than 100,000 USD in cash and transfers it to another person's account.
- D. A person uses the hawala system to transfer 10,000 USD from Australia to a family member in China.

**Answer: B**

Explanation:

Structuring is a technique used in the placement stage of money laundering, in which the launderer deposits or withdraws cash in amounts below the reporting threshold to avoid detection or suspicion. Structuring is also known as smurfing, because it involves using multiple individuals or locations to carry out the transactions. Structuring is illegal in many jurisdictions and is a red flag for money laundering<sup>12</sup>.

Option A is not an example of structuring, but of using an alternative remittance system, which is a method of transferring money outside the formal financial sector. Hawala is a type of alternative remittance system that relies on a network of brokers who settle the transactions through trust and honor. Hawala can be used for legitimate purposes, but also poses a risk for money laundering and terrorist financing<sup>13</sup>.

Option B is not an example of structuring, but of a large cash transaction, which is a common indicator of money laundering. Large cash transactions may involve the proceeds of crime or the attempt to evade taxes or currency controls. Financial institutions are required to report large cash transactions above a certain threshold to the relevant authorities<sup>14</sup>.

Option D is not an example of structuring, but of a wire transfer, which is a method of moving funds electronically from one account to another. Wire transfers can be used for legitimate purposes, but also pose a risk for money laundering and terrorist financing, especially if they involve high-risk jurisdictions, shell companies, or complex chains of transactions<sup>1</sup>.

References: 1: ACAMS (2020), Study Guide for the Certification Examination, 6th Edition, ACAMS, Miami, FL, USA, [www.acams.org/en/cams-certification-package-6th-edition](http://www.acams.org/en/cams-certification-package-6th-edition), pp. 12-14, 18-19, 22-23, 26-27. 2:

ACAMS (2020), CAMS Examination Preparation Video, 6th Edition, ACAMS, Miami, FL, USA, [www.acams.org/en/cams-certification-package-6th-edition](http://www.acams.org/en/cams-certification-package-6th-edition), Module 1, Section 1.2.2. 3: ACAMS (2020), CAMS Examination

Preparation Video, 6th Edition, ACAMS, Miami, FL, USA, [www.acams.org/en/cams-certification-package-6th-edition](http://www.acams.org/en/cams-certification-package-6th-edition), Module 1, Section 1.2.3. 4: ACAMS (2020), CAMS Examination Preparation Video, 6th Edition, ACAMS, Miami, FL, USA, [www.acams.org/en/cams-certification-package-6th-edition](http://www.acams.org/en/cams-certification-package-6th-edition), Module 1, Section 1.2.1. : ACAMS (2020), CAMS Examination Preparation Video, 6th Edition, ACAMS, Miami, FL, USA, [www.acams.org/en/cams-certification-package-6th-edition](http://www.acams.org/en/cams-certification-package-6th-edition), Module 1, Section 1.2.4.

#### NEW QUESTION # 452

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

**Answer: D**

Explanation:

According to the CAMS Certification Package - 6th Edition<sup>1</sup>, a financial institution that processes a wire transfer is required to file a suspicious transaction report (STR) in the jurisdiction where it is located, if it detects any red flags or indicators of money laundering.

terrorism financing, or other financial crimes. The financial institution does not need to file an STR in the jurisdictions of the originator or the beneficiary of the wire transfer, unless it has a branch or a subsidiary there. Therefore, the correct answer is A. The transaction in Country A.

Reference:

CAMS Certification Package - 6th Edition<sup>1</sup>, Chapter 4: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Section: Wire Transfers, pp. 161-162.

### NEW QUESTION # 453

In the FATF 40 recommendations, the focus of AML efforts has been expanded beyond Financial Institutions.

Which three businesses and/or professions are covered? Choose 3 answers

- A. Real estate agents when they are involved in transactions for clients concerning buying and selling properties
- B. casinos, when customers engage in financial transactions equal to or above a designated Threshold
- C. Dealers in art, when they engage in any cash transaction with a customer at or above a designated threshold
- D. Trust and company service providers

**Answer: A,B,D**

Explanation:

Explanation

Expanded coverage of industries :

- \* casinos when customers engage in financial transactions equal to or above a designated threshold.
- \* real estate agents when they are involved in transactions for clients concerning buying and selling properties
- \* dealers in precious metals and stones when they engage in any cash transaction with a customer at or above a designated threshold
- \* lawyers, notaries and independent legal professionals and accountants when they prepare or carry out transactions for clients concerning buying and selling real estate; managing client money, securities or other assets; establishing or managing bank, savings or securities accounts; organizing contributions for the creation or management of companies; creating, operating or managing legal persons or arrangements and buying and selling businesses
- \* trust and company service providers when they prepare or carry out transactions for a client concerning certain activities

### NEW QUESTION # 454

The Head of Compliance was informed by external auditors of a finding that indicates an element of AML policy failed to comply with the regulatory requirement. Which action should the Head of Compliance take next?

- A. Make necessary updates to AML policy documents.
- B. Agree immediately and provide corrective actions.
- C. Inform the compliance team about the finding.
- D. Submit a corrective action plan with a target timeline.

**Answer: D**

Explanation:

The Head of Compliance is responsible for overseeing and managing the AML compliance program of the organization. When an external auditor identifies a finding that indicates a failure to comply with a regulatory requirement, the Head of Compliance should take prompt and appropriate action to address the issue and prevent recurrence. The best course of action is to submit a corrective action plan with a target timeline to the auditor and the relevant regulator, demonstrating the organization's commitment to remediate the finding and improve its AML compliance program. The corrective action plan should include the root cause analysis of the finding, the specific actions to be taken, the responsible parties, the expected outcomes, and the deadlines for completion. The Head of Compliance should also monitor the progress of the corrective action plan and report any updates or challenges to the auditor and the regulator.

Reference:

JPMorgan Chase & Co. Global Anti-Money Laundering Compliance Program, page 2: "The Firm's Global Head of Financial Crimes Compliance is responsible for overseeing the implementation and effectiveness of the AML Program and reports to the Firm's Chief Compliance Officer. ... The Global Head of Financial Crimes Compliance is also responsible for ensuring that the Firm responds appropriately to any regulatory inquiries, examinations, or investigations relating to AML matters, and that any identified issues or deficiencies are promptly remediated." The Board's Role in AML Compliance, Section "Board Oversight of AML Compliance Program": "The board should also ensure that the institution has a process in place to identify, report and correct any compliance deficiencies or violations in a timely manner. This includes ensuring that the institution responds to any regulatory inquiries, examinations or enforcement actions, and implements any required corrective actions." AML Compliance Officer: the Role,

Skills, and Responsibilities, Section "AML Compliance Officer Responsibilities": "The AML Compliance Officer is also responsible for: ... Reporting to the regulators and auditors on the AML compliance program and its effectiveness; ... Developing and implementing corrective action plans for resolution of problematic issues, and providing general guidance on how to avoid or deal with similar situations in the future."

## NEW QUESTION # 455

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