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## [2026] ACAMS CGSS Questions: An Incredible Exam Preparation Way

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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q27-Q32):

### NEW QUESTION # 27

A financial institution's decision to adjust the degree of sensitivity of a screening tool should be based on its transaction volume and:

- A. management commitment.
- **B. risk assessment.**
- C. number of staff.
- D. personnel training.

**Answer: B**

Explanation:

Sanctions and Compliance Domains state that screening calibration must be tied directly to a financial institution's sanctions risk assessment, which evaluates products, customer base, geography, delivery channels, and transaction volume. Sensitivity adjustments must be justified by an institution's assessed sanctions exposure.

Staff levels or training do not determine screening thresholds; these are operational considerations. Management commitment supports governance but does not form the technical basis for calibration decisions.

Reference:

Screening calibration tied to sanctions risk assessments.

Threshold adjustments must reflect actual sanctions exposure and transaction characteristics.

### NEW QUESTION # 28

Those in the virtual currency industry are required to prevent sanctioned persons from exploiting virtual currency to undermine US foreign policy and national security interests. Which internal controls are most appropriate?

- A. Sanctions screening, IP blocking, keyword screening, review end-user agreement
- B. Sanctions screening, internal staff training, keyword screening, batch screening of vendors
- C. Sanctions screening, internal staff training, batch screening of employees, insert restrictions on emails
- D. IP blocking, downsizing compliance staff, keyword screening, updating end-user agreement

**Answer: A**

Explanation:

Effective internal controls for virtual asset service providers include:

- \* Sanctions screening of users, wallets, and transactions.
- \* IP blocking/geolocation controls to stop access from sanctioned jurisdictions.
- \* Keyword screening for wallet names, addresses, or known illicit indicators.
- \* Reviewing and enforcing end-user agreements, including prohibitions on using the platform for sanctioned activity.

Other options include unnecessary or ineffective controls (downsizing staff, screening employees, or vendor-only screening), which are not aligned with sanctions-control best practices.

Reference:

OFAC Guidance for the Virtual Currency Industry.

Controls for preventing sanctioned-person access to digital assets.

### NEW QUESTION # 29

There are some intriguing interactions between externalities, effectiveness, and symbolic objectives.

Select the correct examples for the following statement.

- A. To be successful, symbolic targets will impose costs on the sender.
- B. To be successful, symbolic goals must not impose costs on the sender.
- C. States face optimistic externalities, so rewards are unlikely to be successful.
- D. States face adverse externalities, and rewards can be successful in achieving symbolic objectives.

**Answer: A,C,D**

### NEW QUESTION # 30

Which of the following statements is/are true for Proximal and distal causes?

- A. The process of causation can't be examined to define the order and relations among relevant variables.
- B. A proximal cause is an event that immediately precedes the outcome of interest.
- C. Prior events leading to the proximal cause, removed in the sequence of causal events are referred to as distal causes
- D. The steps from distal and proximal causes to an input of interest are referred to as a chain of causation.
- E. Causal pathways are defined by detailing steps, tracing backward from the outcome, or forward from an initial event.

**Answer: B,C,E**

### NEW QUESTION # 31

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 25% of a legal entity, whereas the Office of Foreign Assets Control applies the 50% 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 50% of a legal entity, whereas the Office of Foreign Assets Control applies the 25% Rule to legal entity ownership for SDD.

**Answer: B**

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 # 32

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