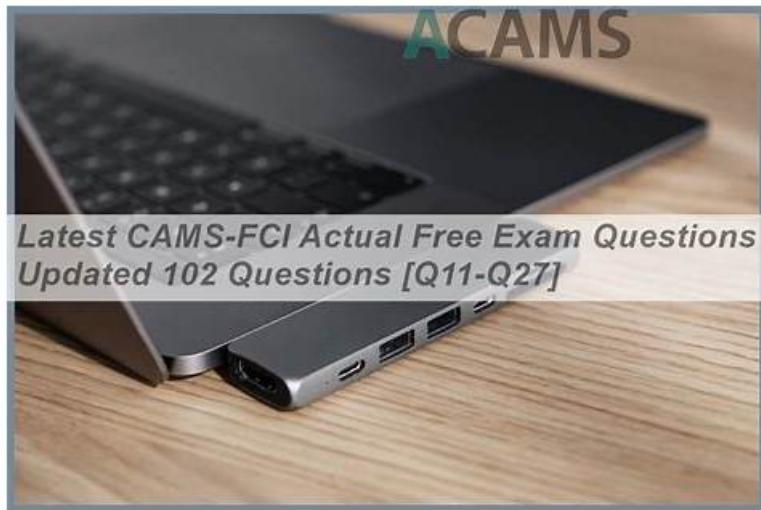


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## ACAMS CAMS-FCI Exam Syllabus Topics:

Topic	Details
Topic 1	<ul style="list-style-type: none"><li>• Financial Crime Typologies Intermediate: This domain is targeted at experienced financial crime analysts and encompasses a four-hour online certificate course that explores various financial crime typologies at an intermediate level. The section covers emerging trends in money laundering, terrorist financing, and other financial crimes.</li></ul>
Topic 2	<ul style="list-style-type: none"><li>• Leading Complex Investigations: This section of the exam measures the skills of senior financial crime investigators and covers advanced techniques for managing and directing intricate financial crime investigations. The four-hour online certificate course delves into strategies for coordinating multi-faceted cases, managing resources effectively, and navigating the complexities of cross-border investigations.</li></ul>
Topic 3	<ul style="list-style-type: none"><li>• Governance of an AFC Investigations Unit: This domain is aimed at compliance professionals who assess candidates' understanding of the governance structures necessary for an effective Anti-Financial Crime (AFC) investigations unit.</li></ul>
Topic 4	<ul style="list-style-type: none"><li>• Reporting Suspicious Activity: This section of the exam is designed for Financial Crime and compliance reporting officers and includes a four-hour online certificate course focusing on the intricacies of reporting suspicious activity.</li></ul>

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## ACAMS Advanced CAMS-Financial Crimes Investigations Sample Questions (Q48-Q53):

### NEW QUESTION # 48

An investigator receives an alert documenting a series of transactions. A limited liability corporation (LLC) wired 59.000,000 USD to an overseas account associated with a state-run oil company. A second account associated with the state-run oil company wired 600.000,000 USD to the LLC. The LLC then wired money to other accounts, a money brokerage firm, and real estate purchases. The investigator initiated an enhanced KYC investigation on the LLC. The financial institution opened the LLC account a couple of weeks prior to the series of transactions. The names associated with the LLC had changed multiple times since the account opened. A search of those names revealed relations with multiple LLCs. Public records about the LLCs did not show any identifiable business activities.

Open-source research identified mixed reports about the brokerage firm

The firm indicated it purchased mutual funds for its clients and dispensed returns to clients.

Media reports claimed the firm laundered money by holding money for a fee before returning it to investors.

Which information should the investigator review first when examining the wire transaction documentation?

- A. The sanctions screening tool to see if the transaction was stopped
- B. How the wire transfers were initiated (e.g., phone, online, branch visit)
- C. The Travel Rule requirements for recordkeeping
- D. Whether the wire transfers were initiated domestically

### Answer: B

Explanation:

Explanation

The investigator should review how the wire transfers were initiated first, because this could indicate the level of involvement and knowledge of the LLC account holders. If the wire transfers were initiated online or by phone, it could suggest that the account holders were trying to avoid face-to-face contact with the bank staff and reduce the chances of being questioned or identified. If the wire transfers were initiated in person at a branch, it could indicate that the account holders were confident or careless about their activities, or that they had some relationship with the bank staff. The method of initiation could also affect the quality and quantity of information collected by the bank about the wire transfers, such as the purpose, source, and destination of the funds. References: ACAMS Advanced Financial Crimes Investigations Certification Study Guide, page 65.

### NEW QUESTION # 49

While each is potentially important, which allows an investigations analyst to better write a SAR/STR narrative that is useful to law enforcement? (Select Two.)

- A. Ensuring all information in the SAR/STR is complete and accurate based on what the institution knows
- B. Including a detailed description of the known or suspected criminal violation or suspicious activity
- C. Including an explanation of the internal process that brought the transaction to the attention of the analyst
- D. Including contact information for individuals at other institutions with whom correspondence has occurred
- E. Including information about the general activity trends in the area where the suspicious transactions were conducted

### Answer: A,B

Explanation:

Explanation

A SAR/STR narrative that is useful to law enforcement should include a detailed description of the known or suspected criminal violation or suspicious activity, as well as ensure that all information in the SAR/STR is complete and accurate based on what the institution knows. These elements help law enforcement to understand the nature and scope of the suspicious activity, and to follow up with further investigation if needed. The other options are not essential for a useful SAR/STR narrative, as they either provide irrelevant or redundant information, or could compromise the confidentiality of the report.

## NEW QUESTION # 50

A government entity established a trust to provide social welfare programs. The entity wants cash payments made to persons without supporting documentation. These persons would oversee the allocation of funds to beneficiaries without complying with internal disbursement of government funds controls. Which is the main premise for filing a SAR/STR?

- A. Trust service providers are not obliged by law to follow government internal controls.
- B. The entity is not implementing adequate internal controls according to what is expected, and mishandling of funds could be occurring.
- C. Social welfare programs are difficult to document because the beneficiaries are from the informal sector.
- D. Cash disbursements are not allowed for social welfare programs.

### Answer: B

Explanation:

Explanation

The main premise for filing a SAR/STR is that the entity is not implementing adequate internal controls according to what is expected, and mishandling of funds could be occurring. This raises suspicion that the entity may be involved in corruption, fraud, or diversion of funds for illicit purposes. Trust service providers are obliged by law to follow government internal controls, as they are subject to AML/CFT regulations and supervision. Cash disbursements are allowed for social welfare programs, but they should be properly documented and verified. Social welfare programs are not necessarily difficult to document, as there are ways to identify and monitor the beneficiaries, such as biometric data or unique identifiers.

## NEW QUESTION # 51

An investigator at a corporate bank is conducting transaction monitoring alerts clearance.

KYC profile background: An entity customer, doing business offshore in Hong Kong, established a banking business relationship with the bank in 2017 for deposit and loan purposes. It acts as an offshore investment holding company. The customer declared that the ongoing source of funds to this account comes from group-related companies.

\* X is the UBO, and owns 97% shares of this entity customer;

\* Y is the authorized signatory of this entity customer. This entity customer was previously the subject of a SAR/STR.

### KYC PROFILE

Customer Name: AAA International Company, Ltd

Customer ID: 123456

Account Opened: June 2017

Last KYC review date: 15 Nov 2020

Country and Year of Incorporation: The British Virgin Islands, May 2017 AML risk level: High Account opening and purpose:

Deposits, Loans and Trade Finance Anticipated account activities: 1 to 5 transactions per year and around 1 million per transaction amount During the investigation, the investigator reviewed remittance transactions activities for the period from Jul 2019 to Sep 2021 and noted the following transactions pattern:

### TRANSACTION JOURNAL

Review dates: from July 2019 to Sept 2021

For Hong Kong Dollars (HKD) currency:

Incoming transactions: 2 inward remittances of around 1.88 million HKD in total from different third parties Outgoing transactions:

24 outward remittances of around 9.4 million HKD in total to different third parties For United States Dollars (USD) currency:

Incoming transactions: 13 inward remittances of around 3.3 million USD in total from different third parties Outgoing transactions: 10 outward remittances of around 9.4 million USD in total to different third parties.

### RFI Information and Supporting documents:

According to the RFI reply received on 26 May 2021, the customer provided the bank with the information below:

1) All incoming funds received in HKD & USD currencies were monies lent from non-customers of the bank.

Copies of loan agreements had been provided as supporting documents. All of the loan agreements were in the same format and all the lenders are engaged in trading business.

2) Some loan agreements were signed among four parties, including among lenders, borrower (the bank's customer), guarantor, and guardian with supplemental agreements, which stated that the customer, as a borrower, who failed to repay the loan Based on the KYC profile and the transaction journal, the pattern of activity shows a deviation in:

- A. product risk rating.
- B. customer risk rating
- C. U.S. currency incoming vs. outgoing transaction rates.
- D. expected vs. actual activity.

### Answer: D

Explanation:

Explanation

The correct answer is A because the expected account activities were 1 to 5 transactions per year and around 1 million per transaction amount, but the actual activity showed much more frequent and varied transactions in different currencies and amounts. This indicates a deviation from the customer's profile and risk level.

References: Advanced CAMS-FCI Study Guide, page 16

## NEW QUESTION # 52

Potential indicators of money laundering associated with Trust and Company Service Providers include:

(Select Two.)

- A. generation of rental income to legitimize illicit funds.
- B. use of legal persons in jurisdictions with strict secrecy laws.
- C. frequent deposits to or withdrawals from bank accounts.
- D. structuring cash deposits into third party accounts.
- E. multi-jurisdictional wire transfers with no legal purpose.

Answer: B,E

Explanation:

Explanation

This is stated in the Certified Anti-Money Laundering Specialist (the 6th edition) manual on page 595, which states: "Potential indicators of money laundering associated with Trust and Company Service Providers include the use of legal persons in jurisdictions with strict secrecy laws, structuring cash deposits into third party accounts, multi-jurisdictional wire transfers with no legal purpose, and frequent deposits to or withdrawals from bank accounts."

## NEW QUESTION # 53

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