

ACAMS.CAMS-CN.v2026-04-06.q423

Exam Code:	CAMS-CN
Exam Name:	Certified Anti-Money Laundering Specialists (CAMS中文版)
Certification Provider:	ACAMS
Free Question Number:	423
Version:	v2026-04-06
# of views:	111
# of Questions views:	4381
https://www.freecram.net/torrent/ACAMS.CAMS-CN.v2026-04-06.q423.html	

NEW QUESTION: 1

恐怖組織使用哪兩種方法來實現收入來源多元化並為其行動提供資金？

(選兩個)

- A. 人口販賣
- B. 捲入國口衝突
- C. 走私文物
- D. 參與電匯活動

Answer: ([SHOW ANSWER](#))

Art and Antiquities: Conduits for Money Laundering and Terrorist Financing Why Fight the Antiquities Trade?

More recently, groups like Daesh (Islamic State [IS]), al-Qaida, the Taliban and their affiliates have been engaged in ****cultural racketeering and terrorism in Iraq, Syria, Yemen, Afghanistan and elsewhere, converting patrimony into cash for weapons and troops****.

<https://www.un.org/press/en/2015/sgsm17427.doc.htm>

As Terrorists Diversify Fundraising Tactics, Greater Efforts Needed to Shut Down Illicit Channels, Secretary-General Tells Finance Ministers' Meeting Terrorists continue to adapt their tactics and diversify their funding sources. Today, Da'esh runs a multi- million-dollar economy in territories under its control. Da'esh terrorists raise money through the oil trade, extortion, undetected cash couriers, kidnapping for ransom, trafficking of humans and arms and racketeering.

They loot and sell precious cultural property, shamelessly profiting from the destruction of humanity's common heritage.

NEW QUESTION: 2

一家金融機構遠端抵押貸款發放部門的當地經理剛發現，沒有對新客口進行製裁篩選在這種情況下，當地經理應該採取什麼行動？

- A. 開始篩選新客口
- B. 立即通知監理機關

C. 立即通知高階管理層

D. 什麼都不做，因為該部門只處理極少數抵押貸款

Answer: (SHOW ANSWER)

This action is the most appropriate because it demonstrates the local manager's responsibility and accountability for the sanctions compliance program. Sanctions screening is an important part of the Know Your Customer (KYC) and Anti-Money Laundering (AML) processes, as it helps to identify and prevent transactions with sanctioned individuals or entities, which could expose the financial institution to legal, regulatory, and reputational risks. Failing to perform sanctions screening could result in violations of sanctions laws and regulations, which could lead to fines, penalties, sanctions, or even criminal prosecution.

Therefore, the local manager should immediately inform senior management of the issue, so that they can take corrective actions, such as implementing screening procedures, conducting a risk assessment, reviewing existing customers, reporting any potential violations, and providing training and guidance to the staff.

The other actions are not appropriate because they either do not address the root cause of the problem, or they could worsen the situation. Starting screening new customers without informing senior management could create a false sense of compliance, and it could also miss the existing customers who may be sanctioned.

Immediately informing the regulators without informing senior management could undermine the trust and communication within the organization, and it could also trigger an investigation or enforcement action before the issue is resolved internally. Doing nothing because the department only handles a very small number of mortgages could be a sign of negligence or indifference, and it could also expose the financial institution to significant risks, as even one transaction with a sanctioned party could have serious consequences.

CAMS Certification Package - 6th Edition | ACAMS, Chapter 4: Developing and Implementing an AML Training Program, pp. 97-98 CAMS Certifications: How to Get CAMS Certified | ACAMS, CAMS Study Guide, pp. 76-77 What is Sanctions Screening and How Does It Work? | Jumio, Introduction and Benefits of Sanctions Screening Sanctions Screening: Challenges and Control Considerations, Background and Regulatory Expectations for Sanctions Screening Sanction Screening: A Complete Guide | KYC AML Guide, What is Sanction Screening and Why is it Important?

NEW QUESTION: 3

根據金融行動特別工作小組 40 項建議，各國應採取哪些措施來協助防止非營利組織被濫用於資助恐怖主義？

A. 允許凍結非營利組織的資口

B. 請所有非營利組織在國家金融情報機構註冊

C. 確保非營利組織不會被用來隱藏或掩蓋將用於合法目的的資金轉移到恐怖分子組織的情況

D. 制定法律，禁止非營利組織在未先透過已知恐怖分子資料庫運作的情況下完成跨境交易

Answer: (SHOW ANSWER)

According to the Financial Action Task Force (FATF) 40 Recommendations, countries should implement measures to prevent the abuse of non-profit organizations (NPOs) for the financing of

terrorism. One of these measures is to ensure that NPOs cannot be used to conceal or obscure the diversion of funds intended for legitimate purposes to terrorists' organizations. This means that countries should have effective mechanisms to monitor and supervise NPOs, especially those that are at risk of terrorist financing abuse, and to take appropriate actions against NPOs that are involved in such activities. Countries should also ensure that NPOs maintain adequate records of their activities and transactions, and that these records are accessible to competent authorities. Furthermore, countries should promote transparency and accountability in the NPO sector, and encourage NPOs to conduct due diligence on their donors, beneficiaries, and associates.

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FATF 40 Recommendations, Recommendation 8 and Interpretive Note to Recommendation 8 Best Practices on Combating the Abuse of Non-Profit Organisations, FATF, June 2015 COMBATING THE ABUSE OF NON-PROFIT ORGANISATIONS (RECOMMENDATION 8), FATF, June 2015 Reference:<http://www.fatf-gafi.org/media/fatf/documents/reports/BPP-combating-abuse-non-profitorganisations.pdf>(p.9)

NEW QUESTION: 4

根據金融行動特別工作小組 (FATF) 的《基於風險的人壽保險業指南》，下列哪些是與第三方參與人壽保險
□品相關的洗錢危險信號？（選兩項）

- A. 客□聘請律師就保單的簽發進行諮詢。
- B. 客□將保單轉移到與原保單簽發機構無關聯的另一家保險公司。
- C. 定期從與保單持有人沒有明顯關係的第三方收到付款。
- D. 客□指定一個看似無關的第三方為受益人。

Answer: (SHOW ANSWER)

FATF and CAMS 6th Edition highlight certain third-party activities as red flags for money laundering in the life insurance sector:

* Payments are regularly received from third parties that have no apparent relationship with the policy holder (C): "Red flags include payments made by third parties, especially where there is no apparent connection between the third party and the policy holder." (FATF, Risk-Based Approach for Life Insurance Sector, Section IV: Red Flags; CAMS 6th Edition, Customer Due Diligence for Life Insurance)

* A customer names an apparently unrelated third party as a beneficiary (D): "Another warning sign is when beneficiaries have no apparent relation to the policyholder." (FATF, Ibid; CAMS 6th Edition, Life Insurance ML/TF Red Flags) Incorrect Options:

* A: Consulting an attorney is not, by itself, a red flag.

* B: Policy transfer may warrant review but is not specifically a red flag for third-party involvement.

References:

CAMS 6th Edition, Life Insurance ML/TF Risks

FATF, Guidance for a Risk-Based Approach for the Life Insurance Sector (October 2018)

NEW QUESTION: 5

反洗錢合規官員收到政府更新通知，其中包括聯合國安理會制裁的最新恐怖分子的姓名，採取哪一個步驟是最適合的？

- A. 通知董事會
- B. 更新包含受制裁人員的監控軟體
- C. 通知客戶他們的資金將被凍結
- D. 更新訓練資訊以包含最新名稱

Answer: (SHOW ANSWER)

The most appropriate step for an AML compliance officer to take upon receiving notice of government update including the names of the latest terrorists sanctioned by the United Nations Security Council is to update the monitoring software containing sanctioned persons. This is because the AML compliance officer is responsible for ensuring that the financial institution does not engage in any transactions or business relationships with individuals or entities that are subject to sanctions, as this could expose the institution to legal, regulatory, and reputational risks. By updating the monitoring software, the AML compliance officer can ensure that the institution's screening and filtering systems are up to date and can flag any potential matches or hits with the sanctioned persons. This would also enable the AML compliance officer to take appropriate actions, such as blocking or freezing funds, reporting to the relevant authorities, and conducting further due diligence, if necessary.

Anti-Money Laundering (AML) | FINRA.org, Overview.

AML Compliance Officer and Their Responsibilities - Tookitaki, Role and Responsibilities of an AML Compliance Officer.

What is an AML Compliance Officer? - Sanction Scanner, Communicate openly with the company's internal management team.

Guidance on Existing AML Program Rule Compliance ... - FinCEN.gov, Financial Institutions Toll-Free Hotline.

NEW QUESTION: 6

金融機構 (FI) 在終止客戶關係的過程中應採取哪些做法？（選擇三項）

- A. 在終止過程中採用靈活的溝通方式，以適應不同的客戶狀況。
- B. 實施包括風險評估和必要文件在內的客戶終止標準化程序。
- C. 對客戶的交易歷史和記錄進行最後審計，以解決終止前任何未解決的問題。
- D. 保留終止過程的記錄，包括決定的理由和與客戶的任何通訊。
- E. 僅在完成終止流程後才通知客戶終止決定，以防止可能發生的爭議。

Answer: (SHOW ANSWER)

Terminating customer relationships due to AML risks requires clear procedures and documentation.

Option B (Correct): A standardized termination procedure ensures compliance, fairness, and consistency.

Option C (Correct): A final review of transactions helps identify suspicious activity before closure.

Option D (Correct): Documenting termination decisions protects the FI from legal and regulatory risks.

Option A (Incorrect): While clear communication is important, termination decisions should be consistent and policy-driven.

Option E (Incorrect): Customers should be notified appropriately but not necessarily after termination.

Reference:FATF Risk-Based Approach Guidance for FIs, Wolfsberg Group Customer Exit Best Practices, FCA AML Guidance on De-risking.

NEW QUESTION: 7

外國金融機構在美國設立代理帳口的三個潛在問題
愛國者法案下的銀行？選出 3 個答案

- A. 取消代理行關係
- B. 沒收美國銀行同業帳口中的資金
- C. 禁止空殼銀行設立代理帳口
- D. 持有私人銀行帳口的美國居民

Answer: A,B,C (LEAVE A REPLY)

The Patriot Act, enacted in 2001, introduced several provisions to enhance the anti-money laundering and counter-terrorist financing (AML/CFT) measures for U.S. banks and their foreign correspondent relationships.

Some of the potential issues for foreign financial institutions (FFIs) maintaining correspondent accounts with U.S. banks under the Patriot Act are:

Cancellation of correspondent banking relationships: The Patriot Act requires U.S. banks to conduct due diligence and enhanced due diligence on their foreign correspondent accounts, and to terminate any account that poses a significant risk of money laundering or terrorist financing. This may result in the cancellation of correspondent banking relationships with FFIs that do not meet the U.S. standards or cooperate with the U.S.

authorities. The loss of correspondent banking relationships may affect the FFIs' ability to access the U.S.

financial system and provide services to their customers.

Forfeiture of funds in a U.S. interbank account: The Patriot Act authorizes the U.S. government to seize and forfeit any funds in a U.S. interbank account that are involved in or traceable to money laundering or terrorist financing activities. This means that FFIs may face the risk of losing their funds in a U.S. interbank account if they or their customers are suspected or accused of engaging in illicit activities.

The forfeiture of funds may have significant financial and reputational consequences for the FFIs and their customers.

Prohibition of correspondent accounts for shell banks: The Patriot Act prohibits U.S. banks from establishing or maintaining correspondent accounts for shell banks, which are banks that have no physical presence in any country and are not affiliated with a regulated financial group. This means that FFIs that are shell banks or have relationships with shell banks cannot access the U.S. financial system through correspondent accounts.

The prohibition of correspondent accounts for shell banks aims to prevent the use of shell banks as vehicles for money laundering and terrorist financing.

CAMS Study Guide, 6th Edition, Chapter 4: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), pp. 81-841 USA PATRIOT Act, Title III: International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001, Sections 312, 319, and 3132

Wolfsberg Anti-Money Laundering Principles for Correspondent Banking, October 2014, pp. 3-43
Reference: http://www.ffiec.gov/bsa_aml_infobase/pages_manual/olm_027.htm

NEW QUESTION: 8

根據《美國愛國者法案》，哪種口品類型受到美國對非美國銀行和非美國個人的管轄？

- A. 商業貸款
- B. 代理銀行業務
- C. 貿易融資
- D. 私人銀行業務

Answer: ([SHOW ANSWER](#))

Correspondent banking is the product type that is subject to US extra-jurisdictional reach over non-US banks and non-US persons under the USA PATRIOT Act. This is because correspondent banking involves the provision of banking services by one bank (the correspondent) to another bank (the respondent) or to the respondent's customers. Correspondent banking enables cross-border transactions and access to foreign financial systems, but also poses significant money laundering and terrorist financing risks due to the lack of transparency and accountability of the parties involved. The USA PATRIOT Act requires US financial institutions to apply enhanced due diligence measures to correspondent accounts for certain foreign banks, such as those operating under offshore banking licenses, those owned or controlled by foreign governments, or those of primary money laundering concern. These measures include obtaining information about the ownership, management, and anti-money laundering controls of the foreign bank, as well as the identity and activity of the customers using the correspondent account. The USA PATRIOT Act also authorizes the US Treasury to prohibit or impose conditions on the opening or maintaining of correspondent accounts for foreign banks that are involved in money laundering or terrorist financing activities.

References:

CAMS Study Guide, 6th Edition, Chapter 5, Section 5.2.1, p. 1611

Financial Crimes Enforcement Network; Anti-Money Laundering Programs; Special Due Diligence Programs for Certain Foreign Accounts, 31 CFR Part 103, RIN 1506-AA292 U).S. Extra-Jurisdictional Reach under the USA PATRIOT Act - Exam-Answer3

NEW QUESTION: 9

機構應將哪些類型的口容納入反洗錢政策和程序？選出 3 個答案

- A. 持續培訓以及新員工的初始培訓
- B. 定期審核，由獨立人員每年至少執行一次
- C. 能口納入相關的立法和監管反洗錢變更
- D. 董事會檢討反洗錢政策

Answer: ([SHOW ANSWER](#))

An institution should incorporate on-going training, periodic audits, and ability to incorporate relevant legislative and regulatory AML changes in its AML policies and procedures. These are essential elements of an effective AML program, as they ensure that the staff are aware of their roles and

responsibilities, the institution is compliant with the applicable laws and regulations, and the AML program is updated and adapted to the changing risks and environment.

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NEW QUESTION: 10

許多監管機構認為下列哪些風險因素代表與 MSB 相關的更高固有風險？（選兩個。）

- A. 使用新科技促進客戶遠端入職
- B. 國際電匯的盛行
- C. 國口中小企業業務
- D. 所提供服務的現金密集性質
- E. 使用數位管道和可追蹤的付款方式

Answer: (SHOW ANSWER)

Money Services Businesses (MSBs) are commonly recognized by regulatory and supervisory authorities as having higher inherent AML/CFT risk, particularly due to certain business characteristics.

Option B - The prevalence of international wire transfers:

MSBs often facilitate cross-border transactions, which present a higher money laundering and terrorist financing risk due to challenges in verifying customer identity, the origin of funds, and the end destination- especially when dealing with higher-risk jurisdictions.

Option D - The cash-intensive nature of the services offered:

Many MSBs deal primarily in cash, which increases the risk of anonymous transactions and funds layering, making it harder to trace illicit activity. Cash is the most vulnerable medium for placement of illicit funds into the financial system.

Option A and Option E, while involving modern technologies, can actually reduce risk when implemented with proper controls (e.g., secure digital onboarding and traceable payments enhance auditability).

Option C does not in itself signal high AML risk unless combined with other red flags.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Industry-Specific Risks- Section: Money Services Businesses (MSBs) and Their Risk Characteristics

NEW QUESTION: 11

一家金融機構 (FI) 正在接受可能洗錢的調查。在與執法機構合作時，金融機構應確保採取哪些額外步驟？（選兩個）

- A. 對所有請求和回應進行集中控制，以確保回應的完整性和及時性
- B. 禁止員工（包括公司高層）接受採訪，並在收到傳票後拒口提供文件
- C. 傳票和其他資訊請求應由高階管理層和調查小組或律師審口。
- D. 制定文件銷毀政策，確保相關文件被銷毀
- E. 對於媒體的詢問，我們不會直接回答，而是回覆「不予置評」來解決。

Answer: (SHOW ANSWER)

When an FI is being investigated for possible money laundering, it is important that it cooperates with the law enforcement agencies (LEAs) in a professional and transparent manner. This means that the FI should take the following steps:

Maintain centralized control over all requests and responses to ensure completeness and timely responses.

This will help the FI to avoid duplication, inconsistency, or omission of information, as well as to track the status and progress of the requests and responses. It will also facilitate the communication and coordination between the FI and the LEAs, and demonstrate the FI's willingness to cooperate¹².

Review subpoenas and other information requests by senior management and an investigations group or counsel. This will help the FI to assess the scope, relevance, and legality of the requests, as well as to identify any potential risks, conflicts, or sensitivities. It will also enable the FI to prepare and provide the requested information in an accurate and timely manner, and to seek clarification or negotiation if necessary¹³.

The other options are not advisable, as they may indicate a lack of cooperation, obstruct the investigation, or damage the FI's reputation. For example:

Making employees, including corporate officers, unavailable for interviews and refusing documents upon receipt of a subpoena may be considered as non-compliance, evasion, or contempt of court, and may result in legal sanctions or penalties⁴.

Addressing the document destruction policy to ensure the relevant documents are destroyed may be seen as tampering with evidence, destroying records, or concealing information, and may constitute a criminal offence or a breach of regulatory obligations⁵.

Not answering inquiries from the media directly, but rather replying, "No comment" may create a negative impression, fuel speculation, or invite criticism, and may harm the FI's image, credibility, or trustworthiness.

Cooperation between FIUs, Law Enforcement Authorities, and Prosecutors

AML and Financial crimes investigation

Mechanisms for interaction of law enforcement agencies in the field of counteracting and combating money laundering Recommendation 30: Responsibilities of law enforcement and investigative authorities Money laundering and illicit finance

NEW QUESTION: 12

員工目睹同事的可疑活動後該做什麼？

- A. 請同事為其行為提供理由。
- B. 上報給公司的衝突專線或合規部門。
- C. 請同事協助決定最佳行動方案。
- D. 與您的主管討論可疑活動。

Answer: (SHOW ANSWER)

An employee who witnesses suspicious activity from a coworker should not confront the coworker or discuss the activity with their supervisor. Instead, they should report the activity to their employer's conflict line or compliance department, who can investigate the matter and take the appropriate action.

It is important to remember that employees are legally obligated to report any suspicious activity they witness.

NEW QUESTION: 13

銀行的反洗錢部門收到匿名舉報，表示客戶可能參與洗錢活動。在調查此事的過程中應考慮哪兩個事實？（選兩個）

- A. 客戶在銀行擁有長期帳戶
- B. 位於貨幣交易報告要求豁免名單中的客戶
- C. 客戶正在向幾個相對高風險的司法管轄區發出多條電匯
- D. 客戶的帳戶活動量較大，但月末餘額通常較低

Answer: C,D (LEAVE A REPLY)

The customer's wire transfers to high-risk jurisdictions and the large volume of activity with low month-end balance are two facts that should be considered during the course of an investigation into possible money laundering. These facts may indicate that the customer is trying to move funds from or to countries that have weak anti-money laundering (AML) controls, or that are known to be a source or destination of illicit funds¹². They may also suggest that the customer is using a technique called "smurfing" or

"structuring", which involves breaking down large amounts of cash into smaller transactions to avoid detection or reporting³⁴. The other two facts are not necessarily indicative of money laundering, as the customer may have a legitimate reason to have a long-standing account at the bank or to be on the exempt list for currency transaction reporting requirements.

1: FFIEC BSA/AML Examination Manual, Appendix F: Money Laundering and Terrorist Financing Red Flags, Geographic Concerns, 5; 2: AML Red Flags - What are the Top 10 Indicators?, ComplyAdvantage, 6; 3: FFIEC BSA/AML Examination Manual, Appendix F: Money Laundering and Terrorist Financing Red Flags, Transaction Has Unusual Features, 5; 4: Money Laundering Red Flags | Key Behaviours and Indicators, High Speed Training, 7.

NEW QUESTION: 14

根據沃爾夫斯堡代理銀行原則，哪種行為被視為對存在更大風險的代理銀行客戶的強化盡職調查義務？

- A. 對所有高風險關係進行審核
- B. 由負責該帳戶的合規官完成的評估
- C. 高階管理委員會批准高風險關係
- D. 對位於避稅天堂國家的客戶進行持續監控

Answer: (SHOW ANSWER)

Under the Wolfsberg Correspondent Banking Principles, conducting enhanced due diligence (EDD) is an obligation for correspondent banking clients that present greater risks. This may include conducting additional research and analysis of the client's background, ownership structure, and transactions. EDD may also involve obtaining additional documentation, verifying the client's identity, and conducting periodic reviews to ensure ongoing compliance. The level of EDD required should be commensurate with the level of risk posed by the correspondent banking relationship. Therefore, option B and D are incorrect. Option A is not specific enough to address the question. Option C is the correct answer as it

highlights the importance of senior management approval for high-risk relationships, which is a key component of EDD.

Reference: Certified Anti-Money Laundering Specialist (the 6th edition) Study Guide, Chapter 7, page 12.

Wolfsberg Correspondent Banking Principles (2014)

NEW QUESTION: 15

金融機構 (FI) 在遵守制裁要求時應採取哪些措施？

- A. 採用自動篩選系統偵測指定人員和實體。
- B. 如果現有客戶成為受制裁實體，則將風險狀況更改為高風險，並繼續監控進一步的交易。
- C. 對制裁名單上的禁止實體進行加強盡職調查 (EDD)。
- D. 一旦董事會批准此決定，即凍結指定個人和實體的資金或資產。

Answer: (SHOW ANSWER)

FIs must have effective sanctions screening processes to prevent transactions involving designated persons or entities.

Option A (Correct): Automated screening systems help financial institutions identify sanctioned individuals, entities, and countries in real time.

Option B (Incorrect): If a customer is listed on a sanctions list, the FI must freeze the account, not simply mark it "high-risk" and continue transactions.

Option C (Incorrect): Prohibited entities should not undergo EDD-transactions with them must be blocked or reported.

Option D (Incorrect): Freezing sanctioned assets does not require board approval; it must be done immediately as per regulations.

Sanctions Compliance Requirements:

Sanctioning Body

Examples of Sanctions Lists

U.S. (OFAC)

Specially Designated Nationals (SDN) List

United Nations (UN)

UN Security Council Sanctions List

European Union (EU)

EU Consolidated Sanctions List

UK (OFSI)

UK Sanctions List

Why Sanctions Screening is Important:

Failing to comply can result in billions in fines (e.g., BNP Paribas paid \$8.9 billion in OFAC fines).

Transactions involving sanctioned entities can be blocked, leading to regulatory scrutiny.

Automated screening tools (e.g., SWIFT, World-Check, LexisNexis) improve compliance efficiency.

Reference:

OFAC Sanctions Compliance Framework

EU Sanctions Regulations

FATF Recommendation 6 (Targeted Financial Sanctions)

NEW QUESTION: 16

在評估和管理在不同於總部的外國司法管轄區運作時的洗錢風險時，有效的反洗錢監控計畫應該：

- A. 將所有外國司法管轄區報告提供給總部批准。
- B. 根據司法管轄區之間的較高標準進行客製化。
- C. 與總部審核保持一致。
- D. 符合國外司法管轄區政策，與總公司政策一致。

Answer: (SHOW ANSWER)

When assessing and managing money laundering risks while operating in foreign jurisdictions different from that of the head office, an effective AML monitoring program should conform to the foreign jurisdiction policies to align with the head office policies. This ensures that the organization's AML/CFT risk management remains consistent across all jurisdictions, while allowing local compliance staff to assess and manage the risks specific to their jurisdiction. Additionally, the program should be tailored to the higher of standards between the jurisdictions, and should be consistent with the head office audits. Providing all foreign jurisdiction reports to the head office for approval is not necessary, as long as the program is consistent with the head office policies.

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NEW QUESTION: 17

一家會計師事務所在一家銀行開設了一個帳戶，旨在用作該企業的營運帳戶。幾個月後，由於該帳戶出現異常活動，觸發了對該帳戶的全面審計。哪一個最有可能觸發審核？

- A. 該帳戶收到的國際付款遠高於他們通常收到的其他費用。
- B. 此帳戶每月捐款給與會計師事務所在同一社區營運的多個慈善機構。
- C. 該帳戶每天會收到來自不同行業的多個客戶的多筆付款。
- D. 此帳戶接收來自中東地區公司的國際電匯，該會計師事務所在該地區設有多個分公司。

Answer: (SHOW ANSWER)

this activity is unusual and inconsistent with the expected behavior of an accounting firm's operational account. The account should normally receive fees from clients that are proportional to the services rendered and reflect the market rates. Receiving international payments that are substantially higher than other fees could indicate that the account is being used to launder money or finance terrorism by

disguising illicit funds as legitimate income. This could trigger a red flag for the bank and prompt a comprehensive review of the account.

ACAMS Study Guide 6th Edition, Chapter 1, Section 1.6, page 24: "Methods to launder money used in banks and other deposit taking institutions".

ExamTopics, Question 446: "An accounting firm opened an account at a bank that is intended to be used as the operational account for the business. After a few months, a comprehensive review of the account was triggered due to unusual activity on the account. Which most likely triggered the review?"

NEW QUESTION: 18

一名銀行員工最近為一家新餐廳開設了帳口。三個月口每日現金存款接近 9,500 美元。

顯示可能存在洗錢或恐怖主義融資的兩個危險信號是什麼？（選兩個）

- A. 餐廳位於不同的城市
- B. 每天的現金存款金額非常接近
- C. 這是一個每天都有現金存款的新帳口
- D. 新帳口顯示穩定的收入流

Answer: ([SHOW ANSWER](#))

These two options are potential red flags for money laundering or terrorist financing because they could indicate an attempt to avoid the reporting threshold of \$10,000 for cash transactions, or to conceal the source or origin of the funds. According to the ACAMS Study Guide, some common indicators of money laundering are:

Transactions structured to avoid recordkeeping or reporting requirements
Transactions inconsistent with the customer's profile or business activity
Transactions involving the use of multiple accounts or locations
Transactions involving high-risk jurisdictions or entities
Transactions involving cash or complex crypto assets
The other two options are not necessarily red flags by themselves, as they could have legitimate explanations.

For example, the restaurant could be located in a different city because of market demand, or the new account could demonstrate a steady flow of income because of the success of the business.

References:

ACAMS Study Guide for the CAMS Certification Examination - 6th Edition, Chapter 2, page 41-42

FFIEC BSA/AML Appendices - Appendix F - Money Laundering and Terrorist Financing Red Flags, page 1-

2

4 Red Flags of Money Laundering or Terrorist Financing, page 1

Money Laundering Red Flags | Key Behaviours and Indicators, page 1

NEW QUESTION: 19

就人壽保險業務而言，第三項歐洲指令規定，成員國可以在業務關係建立後允許對保單受益人進行身份驗證，但在哪些事件之前？

- A. 所購買保單的保費付款被接受時或之前
- B. 保險公司向受益人簽發保單時或之前
- C. 在付款時或之前或受益人打算行使保單賦予的權利之前

D. 依政策建立關係後 30 天或之前

Answer: (SHOW ANSWER)

According to the third European Directive on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing¹, Member States may allow the identity verification of the beneficiary under the policy to be carried out at or before the time of payout or before the beneficiary intends to exercise rights vested under the policy, provided that the following conditions are met:

the beneficiary is identified as a natural or legal person or a legal arrangement, and the verification of the identity is not possible earlier, due to the nature of the product or the transaction; there is a low risk of money laundering or terrorist financing, taking into account the type of policy, the product features, the premium amount, and the distribution channel; the Member States adopt appropriate risk-sensitive measures to prevent the misuse of the policy during the life of the relationship.

This provision is intended to accommodate the specificities of the life insurance sector, where the beneficiary may not be known at the time of the conclusion of the contract, or may change during the life of the policy.

However, the Directive also requires that the identity verification of the beneficiary is carried out as soon as possible after the establishment of the business relationship, and that the insurance undertaking applies enhanced customer due diligence measures when the beneficiary is a politically exposed person.

1: Directive 2005/60/EC of the European Parliament and of the Council of 26 October 2005 on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing (OJ L 309, 25.11.2005, p. 15) 2

NEW QUESTION: 20

《美國愛國者法案》的哪一部分與資金沒收有關並允許其境外實施？

- A. 第 319(b) 條
- B. 第 314(b) 條
- C. 第 314(a) 條
- D. 第 319(a) 條

Answer: (SHOW ANSWER)

NEW QUESTION: 21

根據金融行動特別工作小組 40 項建議，下列哪一種類型的口品或交易可以接受簡化的客口盡職調口或減少措施？

- 1. 年保費不超過 1,000 美元/歐元或單次保費不超過 2,500 美元/歐元的人壽保險保單。
- 2. 退休金計畫的保險單，如果沒有退保條款且保單不能用作抵押品
- 3. 一名盧員工。
- 4. 委託人、受託人和受益人已確定且股份為不記名形式的信託。

- A. 僅限 1、2 和 3
- B. 限 1、2 和 4

C. 僅限 1、3 和 4

D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

According to the Financial Action Task Force (FATF) 40 Recommendations, simplified customer due diligence (CDD) or reduced measures could be acceptable for certain types of products or transactions that have a low risk of money laundering or terrorist financing, based on a reasonable assessment of the risk by countries or by financial institutions. These include:

* Life insurance policies where the annual premium is no more than USD/EUR 1,000 or a single premium of no more than USD/EUR 2,500. This is because the amount of money involved is relatively small and the payout is usually contingent on a specific event, such as death or disability, which reduces the likelihood of abuse by criminals.

* Insurance policies for pension schemes if there is no surrender clause and the policy cannot be used as collateral. This is because the beneficiaries of these policies are usually predetermined and the funds are locked in until retirement age, which limits the possibility of transferring or withdrawing the money for illicit purposes.

* A pension, superannuation or similar scheme that provides retirement benefits to employees, where contributions are made by way of deduction from wages and the scheme rules do not permit the assignment of a member's interest under the scheme. This is because the source of funds is known and verified by the employer and the scheme is regulated and supervised by competent authorities, which reduces the risk of money laundering or terrorist financing.

The other option, trusts where the settlor, trustee and beneficiaries are identified and the shares are in bearer form, is not eligible for simplified CDD or reduced measures, because the use of bearer shares poses a high risk of anonymity and concealment of beneficial ownership, which could facilitate money laundering or terrorist financing.

FATF 40 Recommendations, Recommendation 10 and Interpretive Note to Recommendation 10, paragraphs 17-18.

NEW QUESTION: 22

下列哪些是基於風險的方法的一部分？（選擇三項）

- A. 根據客戶的活動和關係來決定客戶的詳細風險狀況
- B. 主要關注先前標記的客戶，同時對其他客戶使用標準控制
- C. 選擇並應用與已確定的風險等級相符的有效控制措施
- D. 進行全面的風險評估以識別客戶、交易和地理風險
- E. 在所有客戶群之間平等分配資源，以確保公平

Answer: (SHOW ANSWER)

A risk-based approach is central to AML/CFT programs and includes:

* A: Creating detailed risk profiles for customers based on their behaviors and connections.

* C: Applying controls that are tailored to the actual risk (not a one-size-fits-all approach).

* D: Performing a thorough risk assessment, considering customer, transaction, and geographic factors.

"A risk-based approach involves risk profiling, tailored controls, and comprehensive risk assessment across key risk factors." (CAMS 6th Edition, Risk-Based Approach and Risk Assessment) Incorrect:

* B: Monitoring only flagged customers is not sufficient.

* E: Equal allocation of resources ignores differing risk levels.

References:

CAMS 6th Edition, AML Compliance Program

FATF Recommendation 1: Risk-Based Approach

NEW QUESTION: 23

作為高風險客戶強化盡職調查 (EDD) 的一部分，應收集哪些資訊？

A. 婚姻狀況變化的證明

B. 控制該帳戶的個人的詳細信息

C. 出差旅行計劃

D. 個人參考資料

Answer: (SHOW ANSWER)

According to the CAMS Study Guide, EDD is a higher level of scrutiny applied to customers who pose a greater risk of money laundering or terrorist financing. EDD may include obtaining additional information on the customer's identity, source of funds, business activities, beneficial owners, and expected transactions.

Details on individuals with control over the account are relevant for EDD, as they may indicate the involvement of politically exposed persons (PEPs), sanctioned individuals, or other high-risk entities. Therefore, this information should be gathered as part of EDD for a high-risk customer.

CAMS Study Guide, 6th Edition, Chapter 4, page 121.

Reference: <https://sanctionscanner.com/knowledge-base/customer-due-diligence-cdd-15>

NEW QUESTION: 24

某金融機構的反洗錢專家收到法律要求，要求提供特定個人自2004年以來的所有交易記錄。應提供下列哪一項？

1. 自2004年以來該個人的月報表和交易活動。

2. 自2004年以來該個人的所有電匯。

3. 該個人自2004年以來開設的帳戶的簽章卡。

4. 自2004年以來該個人的所有證券交易活動。

A. 僅限 1、2 和 3

B. 限 1、2 和 4

C. 僅限 1、3 和 4

D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

According to the CAMS study guide, chapter 4, page 1191, transaction records include any records that reflect the movement of funds or assets, such as wire transfers, checks, deposits, withdrawals, securities trades, etc. Therefore, items 1, 2, and 4 are examples of transaction records that should be

delivered in response to a legal request. Item 3, signature cards, are not transaction records, but rather account opening documents that contain the customer's name, address, identification, and signature. These documents may be relevant for customer due diligence or identification purposes, but they do not reflect the transaction activities of the customer.

1: ACAMS CAMS Study Guide - 6th Edition, Chapter 4, page 119: <https://www.acams.org/wp-content/uploads/2019/09/ACAMS-CAMS-Study-Guide-6th-Edition-Chapter-4.pdf>

NEW QUESTION: 25

下列哪些實體可能帶來更高的洗錢風險並需要在入職前進行額外審問？（選兩個）

- A. 一家擁有大量記錄在案的電匯活動的大型跨國公司
- B. 一家本地便利商店，用收銀機中的現金補充現場自動櫃員機(ATM)
- C. 當地一家二手車銷售場，允許個人以現金支付每月帳單
- D. 虛擬資安服務提供者 (VASP)，促進點對點加密貨幣交易

Answer: (SHOW ANSWER)

Higher-risk customer profiles often include businesses that:

Regularly handle large volumes of cash

Operate in sectors with historical vulnerabilities to money laundering

Are involved in virtual assets or unregulated financial activities

Option C - A local used car sale lot that allows cash payments:

This business type is considered cash-intensive, and accepting monthly payments in cash raises concerns about the source of funds, potential structuring, or placement of illicit proceeds.

Option D - A Virtual Asset Service Provider (VASP):

VASPs involved in peer-to-peer crypto transactions present elevated AML risks due to the anonymity, speed, and borderless nature of virtual assets. These institutions are often subject to enhanced due diligence requirements.

Option A is incorrect: A large multinational with documented transactions and transparency typically poses lower inherent risk, though still subject to review.

Option B may be reviewed, but on-site ATM replenishment using store cash is not automatically a red flag without other risk indicators.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Customer Risk Profiling- Section: Higher-Risk Business Types and Entities

NEW QUESTION: 26

合規官員應如何回應執法機構要求提供接受調問的客戶資訊的請求？

- A. 與金融機構 (FI) 指定部門合作，確定符合要求的適當行動方案
- B. 收集所有請求的文件並透過安全電子郵件發送給請求機構。
- C. 與每天處理此類客戶的同事分享調問的詳細資訊。
- D. 凍結帳戶資訊並告知客戶在調問完成之前不會釋放資訊

Answer: (SHOW ANSWER)

A compliance officer should cooperate with the law enforcement inquiry as much as possible, but also ensure that the request is valid, lawful, and does not violate any confidentiality or privacy obligations.

Therefore, the compliance officer should collaborate with the FI's designated department, such as the legal counsel, the senior management, or the board of directors, to determine the appropriate course of action to comply with the request¹². The compliance officer should also ensure that all communication, written and oral, is funneled through a centralized place, and that the FI maintains a record of the request and the response¹².

1: Requests by Law Enforcement for Financial Institutions to Maintain Accounts, FinCEN, 2014

2: Best Practices for Compliance and Enforcement-Related Information Requests, EPA, 2018

Reference: <https://www.acams.org/en/resources/aml-glossary-of-terms>

NEW QUESTION: 27

金融實體違反反洗錢法可能面臨哪些聲譽風險後果？

- A. 扣押資口
- B. 罰款
- C. 監控行為的審核成本增加
- D. 知名客口的流失

Answer: (SHOW ANSWER)

Reputational risk is the potential for negative publicity, public perception, or legal action to adversely affect a financial entity's image, brand, or customer loyalty¹. Violating AML laws can have significant reputational risks for financial entities, as they may be perceived as facilitating or enabling money laundering, terrorist financing, or other illicit activities. This can result in a loss of trust, credibility, and revenue from existing and potential customers, especially those who are high-profile, sensitive, or socially responsible²³. Moreover, violating AML laws can also attract negative media attention, regulatory scrutiny, and legal action, which can further damage the reputation of the financial entity and expose it to additional sanctions, fines, or penalties⁴.

1: ACAMS, CAMS Study Guide, 6th Edition, Chapter 1, page 16

2: ComplyAdvantage, 5 AML Reputational Risk Considerations for 2023, link

3: Exam-Answer, Reputational Risk Consequences for Violating AML Laws, link

4: Unit21, 8 AML Penalties, Fines, and Sanctions + Examples You Should Avoid, link

Reference: https://www.ifc.org/wps/wcm/connect/e7e10e94-3cd8-4f4c-b6f8-1e14ea9eff80/45464_IFC_AML_Report.pdf?MOD=AJPERES&CVID=mKKNshy

NEW QUESTION: 28

根據埃格蒙特的口法，金融情報機構(FIU)採取了哪些保障措施來安全地分享資訊？

- A. 金融情報機構的所有成員都可以存取有權存取埃格蒙特安全網路的電腦。
- B. 資訊共享是根據諒解備忘錄中所包含的流程進行的。
- C. 情報透過訊息傳遞應用程式分享。
- D. 允許調口人員直接向外國金融情報機構索取資訊。

Answer: (SHOW ANSWER)

According to the Egmont Group of Financial Intelligence Units Principles for Information Exchange Between Financial Intelligence Units, one of the channels for the exchange of information between FIUs is the Egmont Secure Web (ESW), which is a secure and encrypted communication system that

allows FIUs to share information and expertise¹. The ESW is accessible to all members of the FIU who have been authorized by the FIU head or his/her delegate¹. The other options are not correct because:

B). Information sharing is not always conducted according to processes contained in Memoranda of Understanding (MOUs). The Egmont Group encourages FIUs to exchange information regardless of the existence of an MOU¹.

C). Intelligence is not shared via messaging applications. This would not be a secure or reliable way of exchanging sensitive information.

D). Investigators are not allowed to request information from a foreign FIU directly. Requests for information must be made through the FIU of the requesting country¹.

Egmont Group of Financial Intelligence Units Principles for Information Exchange Between Financial Intelligence Units The Egmont Group of Financial Intelligence Units | FinCEN.gov The Egmont Group of The Egmont Group of Financial Intelligence Units Reference:

<https://www.elibrary.imf.org/view/books/069/02365-9781589063495-en/ap01.xml>

NEW QUESTION: 29

歐盟的「駭髒反洗錢」指令有哪些要求？{選兩項。}

- A. 將銀行的記錄保存義務提升至反洗錢調口所需的最大資料量
- B. 擴大高風險第三國的評估標準
- C. 將 AML 規則擴展到提供虛擬貨幣服務的實體
- D. 制定應對有組織犯罪和恐怖主義威脅的策略的不同方法
- E. 根據金融情報機構功能、權限和權力性質的差異向其提供資訊存取權限

Answer: ([SHOW ANSWER](#))

A . Promoting the record-keeping obligations of banks to the maximum amount of data necessary for the purposes of AML investigations: "The Fifth AML Directive emphasizes that record-keeping obligations of banks must extend to the maximum amount of data necessary for the purposes of anti-money laundering investigations" (CAMS Manual, 6th Edition, page 79).

C . Extending AML rules to entities that provide virtual currency services: "The 5AMLD expands the scope of the EU's anti-money laundering rules to include virtual currency exchange platforms and custodian wallet providers" (CAMS Manual, 6th Edition, page 80).

Top of Form

Bottom of Form

NEW QUESTION: 30

如果沒有完善的反洗錢合規計劃，就不可能實現機構目標

- A. 篩選所有員工。
- B. 訓練適當的員工。
- C. 驗證帳戶擁有者。
- D. 主管機關的認可。

Answer: ([SHOW ANSWER](#))

According to the ACAMS CAMS Certification Study Guide, 6th Edition, one of the four pillars of an effective anti-money laundering compliance program is the training of appropriate employees on their responsibilities and the institution's policies and procedures. Training is essential to ensure that employees are aware of the risks of money laundering and terrorist financing, the applicable laws and regulations, the red flags and indicators of suspicious activity, and the reporting and record-keeping requirements. Without proper training, employees may not be able to perform their duties effectively and efficiently, and may expose the institution to legal, regulatory, reputational, and operational risks. ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 2, Section 2.1.4, page 39. ACAMS CAMS Certification Video Training Course, Module 2, Lesson 2.1.4.

NEW QUESTION: 31

為了避免暴力衝突升級和/或武器擴散，可能首先使用哪種類型的製裁？

- A. 資口凍結
- B. 金融禁令
- C. 匯出與匯入限制
- D. 武器及相關材料禁運

Answer: ([SHOW ANSWER](#))

Export and import restrictions are sanctions imposed by countries to limit or prevent the import or export of certain goods and services. Export and import restrictions are typically used in order to protect a country's economic or political interests, or to prevent the proliferation of weapons or other dangerous materials. Export and import restrictions are often the first type of sanctions used in order to avoid escalating violent conflicts and/or proliferation of weapons. Examples of export and import restrictions include embargoes, quotas, or tariffs.

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NEW QUESTION: 32

哪些交易監控流程會向銀行發出危險訊號活動警報？

- A. 通常不會使用信用卡進行奢華購物的顧客會在旅遊網站上預訂機票。
- B. 該公司的名稱類似於其董事被列入銀行口部黑名單的公司的名稱。
- C. 客口使用信用卡預付款，一週後使用國外的自動櫃員機(ATM) 多次提取現金。
- D. 慈善帳口收到多次電子轉賬，然後將電匯發送到風險較高的國家。

Answer: ([SHOW ANSWER](#))

This is a red flag of money laundering or terrorist financing that involves the use of non-profit organizations (NPOs) as conduits for illicit funds. NPOs may be vulnerable to abuse by criminals who exploit their legitimate activities, reputation, and access to funds and resources. A transaction monitoring process that would alert a bank for this red flag activity is to analyze the source, destination, frequency, and purpose of the funds transferred to and from the charity account, and to compare them with the expected profile and activity of the NPO. If the bank detects any inconsistency, discrepancy, or deviation from the norm, it should raise an alert and conduct further investigation.

FATF Report: Risk of Terrorist Abuse in Non-Profit Organisations, page 9 Transaction Monitoring Processes for Red Flag Activity in Banking AML Red Flags - What are the Top 10 Indicators? - ComplyAdvantage, section "Red flags related to the nature of transactions"

NEW QUESTION: 33

根據巴塞爾委員會的規定，客戶接受、客戶盡職調查以及記錄保存政策和程序應根據需要進行更改，以便：

- A. 解決開戶程序中的 KYC 缺陷。
- B. 確保每三個月檢視一次政策和程序。
- C. 解決與新進員工嚴格相關的結構變化。
- D. 解決組織內各業務線之間的風險差異。

Answer: D (LEAVE A REPLY)

The Basel Committee on Banking Supervision (BCBS) is an international body that sets standards and guidelines for the prudential regulation of banks. One of its key publications is the Customer Due Diligence for Banks, which outlines the essential elements of Know Your Customer (KYC) standards for banks.

According to this document, customer acceptance, customer due diligence, and record-keeping policies and procedures should be changed as necessary to address variations in risk among each line of business within the organization. This means that banks should adopt a risk-based approach to KYC, taking into account the different types, levels, and sources of risk associated with different customers, products, services, transactions, and delivery channels. By doing so, banks can allocate their resources more efficiently and effectively, and mitigate the potential for money laundering, terrorist financing, and other financial crimes.

References:

Customer Due Diligence for Banks, BCBS, October 2001, p. 5, 14-15.

The Basel Committee: The Important Set Of International Banking Regulations, Financial Crime Academy, November 2023.

NEW QUESTION: 34

美國一家大型銀行的外國代理銀行部副總裁已接獲通知，一家擁有離岸執照的外國銀行想要開設代理帳戶。

根據《美國愛國者法案》，副總統必須獲得哪兩件事？（選兩個）

- A. 代理行的所有客戶列表
- B. 代理行所服務的業務類型列表

- C. 與外國銀行反洗錢計畫相關的信息
- D. 代理行10%所有者的身份，除非是公開交易的

Answer: (SHOW ANSWER)

According to section 312 of the USA PATRIOT Act, U.S. financial institutions that maintain correspondent accounts for foreign financial institutions must apply due diligence to such accounts. The due diligence must include obtaining information relating to the foreign bank's anti-money laundering program, as well as the identity of any person who owns 10% or more of the foreign bank, unless the foreign bank is publicly traded.

These requirements are intended to prevent the use of correspondent accounts by foreign shell banks or other entities that may pose a high risk of money laundering or terrorist financing.

USA PATRIOT Act | FinCEN.gov

FACT SHEET for Section 312 of the USA PATRIOT Act Final Regulation and Notice of Proposed Rulemaking | FinCEN.gov
US PATRIOT ACT | State Street CAMS Exam: USA PATRIOT Act
Requirements for Opening a Correspondent Account

NEW QUESTION: 35

一家零售銀行剛收購了信用卡業務。該銀行的反洗錢政策要求新員工在入職後 30 天內接受培訓，並每年向所有員工提供進修培訓。

銀行現有的反洗錢訓練是否足以提供新收購的信用卡業務的員工訓練？

- A. 是的，現有訓練涵蓋銀行的政策、程序和流程。
- B. 不可以，信用卡事業需要面對面進行反洗錢訓練。
- C. 不，反洗錢培訓需要量身定制，並專注於企業特有的風險。
- D. 是的，現有的訓練涵蓋了銀行需要遵守的反洗錢法規。

Answer: (SHOW ANSWER)

The bank's existing anti-money laundering training is not adequate to be delivered to the employees of the newly acquired credit card business, because anti-money laundering training needs to be tailored and focused on the risks specific to the business. Credit card businesses face different types of money laundering risks than retail banks, such as card-not-present fraud, identity theft, card skimming, and prepaid card abuse. Therefore, the anti-money laundering training for credit card businesses should cover the specific red flags, indicators, typologies, and mitigation measures related to these risks, as well as the relevant laws and regulations that apply to credit card businesses.

CAMS Study Guide, 6th Edition, Chapter 4, Section 4.31

CAMS Study Guide, 6th Edition, Chapter 5, Section 5.21

Certification Candidate Handbook, Section 3.22

Latest CAMS Exam Questions, Question 433

NEW QUESTION: 36

一家公司透過不同的活動支持實施恐怖主義，例如開發支持恐怖主義的電視資訊內容、鼓勵透過網路支持恐怖活動、宣傳加密貨幣的使用以及向電視和網路資訊的製作人和記者付費。哪些具體行動應視為資助恐怖主義？

- A. 鼓勵支持性網路訊息
- B. 向製作人和記者支付電視和網路訊息的費用
- C. 發展支持恐怖主義的口容
- D. 宣傳加密貨幣的使用

Answer: (SHOW ANSWER)

Financing terrorism generally refers to providing money or other support, such as personnel or technology, to terrorist activities. This can include providing funds to terrorist networks, providing services to support terrorist operations, and providing resources to support terrorist activities. In this case, paying producers and reporters for television and web messaging would be considered financing of terrorism, as it is providing support for terrorist activities.

NEW QUESTION: 37

金融機構 (FI) 必須了解其他司法管轄區的反金融犯罪 (AFC) 和製裁監管制度。

- A. 彌補亞洲金融公司和製裁法規對跨境交易的適用性有限以及與其他司法管轄區國口業務的相關性降低。
- B. 確保根據商業活動發生地所在國家的監管標準有選擇地實施制裁制度，主要關註一致的司法管轄區
- C. 確保 F1 能口在比其祖國監管更嚴格或更寬鬆的司法管轄區管理業務關係，從而實現營運彈性
- D. 遵守亞足聯以及 F1 營運或有業務關係的所有國家的製裁要求，避免因外國司法管轄區的違規行為而受到處罰。

Answer: (SHOW ANSWER)

NEW QUESTION: 38

金融機構應採取哪些措施來識別和調口客口的洗錢活動？（選兩個）

- A. 負面新聞篩選
- B. 誠信政策
- C. 檢舉熱線
- D. 行為準則
- E. 事務監控

Answer: A,E (LEAVE A REPLY)

According to the ACAMS CAMS Study Guide, 6th Edition, Chapter 3, Section 3.2, the financial institution should implement the following measures in order to identify and investigate money laundering activity from their clients:

Adverse news screening: This is a process of checking the clients' names and related parties against various sources of negative or adverse information, such as media reports, sanctions lists, watch lists, law enforcement databases, etc. Adverse news screening can help the financial institution to detect any potential red flags or indicators of money laundering or other criminal activities involving their clients, and to take appropriate actions, such as conducting enhanced due diligence, filing suspicious activity reports, or terminating the relationship.

Transaction monitoring: This is a process of reviewing and analyzing the clients' transactions and activities, such as deposits, withdrawals, transfers, payments, etc., to identify any unusual or suspicious

patterns or behaviors that deviate from their normal or expected profile. Transaction monitoring can help the financial institution to detect any possible signs of money laundering or other financial crimes, such as structuring, layering, integration, fraud, tax evasion, etc., and to investigate and report them accordingly.

The other options are not measures that the financial institution should implement in order to identify and investigate money laundering activity from their clients, although they may be part of the overall AML program or compliance culture:

Integrity policy: This is a document that outlines the ethical principles and values that guide the conduct and behavior of the financial institution and its employees. An integrity policy can help the financial institution to promote a culture of honesty, transparency, and accountability, and to prevent or deter any misconduct or corruption. However, an integrity policy alone is not sufficient or specific enough to identify and investigate money laundering activity from their clients.

Whistleblower hotline: This is a mechanism that allows the employees or other stakeholders of the financial institution to report any suspected or observed violations of the AML policies, procedures, or regulations, or any other wrongdoing or malpractice, without fear of retaliation or reprisal. A whistleblower hotline can help the financial institution to encourage and facilitate the reporting of any potential or actual money laundering activity from their clients or within the organization, and to protect the rights and interests of the whistleblowers. However, a whistleblower hotline is not a measure that the financial institution implements to identify and investigate money laundering activity from their clients, but rather a tool that supports the AML program and compliance function.

Code of conduct: This is a document that defines the standards and expectations of the financial institution and its employees regarding their professional and ethical behavior, responsibilities, and obligations. A code of conduct can help the financial institution to establish and maintain a culture of compliance and integrity, and to prevent or address any conflicts of interest, misconduct, or abuse of power. However, a code of conduct is not a measure that the financial institution implements to identify and investigate money laundering activity from their clients, but rather a framework that governs the AML program and compliance function.

References:

ACAMS CAMS Study Guide, 6th Edition, Chapter 3, Section 3.2

ACAMS CAMS Certification Video Training Course - Exam-Labs

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)

NEW QUESTION: 39

當外國資口管制辦公室指定交易方時，美國(US) 銀行何時必須阻止或拒口國際資金轉帳？

- A. 僅當美國銀行參與資金轉帳時
- B. 只有當美國個人或實體是最終受益人時
- C. 僅當最終受益人為非美國個人或實體時
- D. 僅當美國銀行的代理行通知其指定方的參與時

Answer: (SHOW ANSWER)

A U.S. bank must block or reject an international funds transfer when there is an OFAC designated party to the transaction, regardless of the beneficiary or the correspondent bank. This is because the

U.S. bank is prohibited from dealing with any person or entity that is on the Specially Designated Nationals and Blocked Persons List (SDN List) or subject to any other OFAC sanctions program¹. The SDN List includes individuals, groups, and entities, such as terrorists and narcotics traffickers, that are designated under programs that are not country-specific². The U.S. bank must also report any blocked or rejected transactions to OFAC within 10 business days³.

1: FFIEC BSA/AML Office of Foreign Assets Control - Office of Foreign ... 2: Specially Designated Nationals And Blocked Persons List (SDN) Human ... 3: [Reporting Blocked Transactions | Office of Foreign Assets Control]

NEW QUESTION: 40

當發現可疑活動時，執法部門應如何從機構取得文件？（選兩個。）

- A. 向責任機構索取相關文件的副本。
- B. 向負責機構的員工付費以影印文件。
- C. 請金融情報機構 (FIU) 分享可疑交易報告的副本。
- D. 向金融情報機構索取文件。
- E. 取得搜索令以取得文件。

Answer: (SHOW ANSWER)

Law enforcement should obtain documentation from an institution when suspicious activity was identified by either requesting copies of the relevant documents from the accountable institution or acquiring a search warrant to obtain the documents. These are the legal and proper ways to access the supporting documentation that the institution is required to maintain for five years after filing a suspicious activity report (SAR). The institution must provide the documentation upon request by FinCEN or an appropriate law enforcement or supervisory agency, and should verify the identity and authority of the requestor. Law enforcement can also obtain a search warrant from a court if they have probable cause to believe that the documents contain evidence of a crime.

Suspicious Activity Report Supporting Documentation

Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations, Question 1.

Obtaining Documentation from an Institution: Law Enforcement Procedures Reference:

<https://www.federalregister.gov/documents/2010/12/03/2010-29869/financial-crimes-enforcement-network-confidentiality-of-suspicious-activity-reports>

NEW QUESTION: 41

根據埃格蒙特集團的調口，公私部門合作 (PPP) 能為金融情報機構 (FIU) 帶來哪些好處？（選擇三項）

- A. 幫助克服資料保護和資訊共享的限制
- B. 提高報告品質和附加資訊輸入
- C. 幫助減輕執法部門的財務成本負擔
- D. 協助設計通用方法並確定所需的可交付成果
- E. 提供靈活性、敏捷性和適應 ML/TF 威脅環境的機會

Answer: (SHOW ANSWER)

According to the Egmont Group and CAMS 6th Edition, PPPs benefit FIUs by:

* A: "PPPs help address challenges around data protection and facilitate information sharing between public and private sectors, overcoming common legal barriers."

* B: "PPPs result in higher-quality reports from the private sector and provide valuable additional informational input for FIUs."

* E: "These partnerships give FIUs increased flexibility and agility, allowing them to respond dynamically to evolving ML/TF threats."(CAMS 6th Edition, Egmont Group Guidance on PPPs; Egmont Group, Public-Private Partnerships for FIUs) References:

CAMS 6th Edition, Public-Private Partnerships

Egmont Group, "Public-Private Partnerships: FIU Benefits and Considerations"

NEW QUESTION: 42

歐盟 (EU) 國家的一家企業服務供應商擁有來自從事石油和天然氣交易的非洲國家的潛在客戶。該潛在客戶打算利用由第三方擔保的 7,500 萬美元貸款在其祖國開發一個石油碼頭，該第三方是在加勒比海島嶼上成立的信託公司，其控股公司位於歐洲的一個秘密天堂。一位年輕女士被描繪成最終受益所有人，她透過祖國的一家健身工作室獲得了財富。

可能表示洗錢或資助恐怖主義的兩個危險信號是什麼？（選兩個）

- A. 由第三方擔保人提供的價值 7,500 萬美元的貸款
- B. 擔保公司股權結構過於複雜
- C. 潛在客戶希望在歐盟國家建立控股公司的公司架構
- D. 最終受益所有人是透過小型企業獲得財富的年輕女士

Answer: (SHOW ANSWER)

According to the ACAMS study guide¹, some of the common red flags for money laundering or financing terrorism are:

Customers who provide insufficient or suspicious information, such as unusual or unverifiable identification documents, different taxpayer identification numbers, or vague or inconsistent information about their business or source of funds.

Transactions that have unusual features, such as large cash payments, unexplained payments from a third party, use of multiple or foreign accounts, complex or illogical transactions, or transactions that are inconsistent with the customer's profile or expected behavior.

Geographic concerns, such as transactions involving high-risk jurisdictions, offshore financial centers, secrecy havens, or countries subject to sanctions or embargoes.

Ultimate beneficial ownership that is unclear, such as customers who use shell companies, trusts, or other legal entities to obscure their identity or the identity of the true owners or controllers of the funds or assets.

In this scenario, two red flags that could indicate money laundering or financing terrorism are:

B). The guarantor company's ownership structure is overly complex. This could be an attempt to hide the true source or destination of the funds, or to evade regulatory or law enforcement scrutiny. The use of a trust formed in a Caribbean island and a holding company based in a European secrecy haven could also indicate geographic concerns, as these jurisdictions are known for their low transparency and high confidentiality.

D). The ultimate beneficial owner is a young lady who has gained her wealth through a small business. This could be a case of false or misleading information, as the source of funds is not commensurate with the size or nature of the transaction. The fitness studio business could be a front or a cover for illicit activities, or the young lady could be a nominee or a straw man for the real owner or beneficiary.
= 1 ACAMS. (2020). Study Guide for the Certification Examination: Sixth Edition. Miami, FL: ACAMS.

NEW QUESTION: 43

建立涉及執法機構、金融情報機構 (FIU) 和私營部門之間資訊共享的公私合作夥伴關係 (PPP) 的目的是：
(選擇兩個)

- A. 公共當局與義務實體之間交換營運訊息
- B. 金融情報機構與義務實體之間交換戰略訊息
- C. 金融機構之間交換策略訊息
- D. 建立關鍵資訊通用資料庫，並與FATF 共用可疑活動分析

Answer: (SHOW ANSWER)

Public-Private Partnerships (PPPs) are collaborative initiatives involving law enforcement, FIUs, and financial institutions. Their objective is to improve the efficiency and effectiveness of the fight against money laundering, terrorist financing, and other financial crimes by sharing both operational and strategic intelligence.

Option A - Exchange operational information between public authorities and obliged entities:

PPPs often facilitate real-time or near-real-time information sharing that supports specific investigations and the detection of suspicious activity, helping financial institutions respond quickly and accurately to ongoing threats.

Option B - Exchange strategic information between FIUs and obliged entities:

Strategic-level intelligence sharing helps financial institutions understand typologies, risk trends, and evolving criminal methods, thereby strengthening their risk assessments and transaction monitoring frameworks.

Option C is incorrect: Strategic information exchange between private institutions is limited and heavily regulated.

Option D is incorrect: FATF does not collect or manage databases of suspicious activity reports; it sets standards and reviews national frameworks.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Public-Private Partnerships and Information Sharing- Section: Purpose and Function of PPPs in AML/CFT

NEW QUESTION: 44

為什麼金融機構 (FI) 需要更新其反洗錢風險評估？

- A. 根據 FI 變更確定共享資訊的風險注意事項
- B. 確保準確反映佛羅裡達州的洗錢和其他非法金融活動風險
- C. 報告可疑活動時滿足執法單位的要求
- D. 確保 FI 與董事會批准的策略計畫保持一致

Answer: (SHOW ANSWER)

A financial institution should regularly update its AML risk assessment in order to ensure that the results of the assessment are accurate and reflect the current money laundering and other illicit financial activity risks that the institution may face. This helps to ensure the institution has a comprehensive understanding of the risks associated with its activities and can implement adequate controls and procedures as necessary.

NEW QUESTION: 45

根據巴塞爾銀行監理委員會的規定，銀行應透過以下方式處理高風險客戶：

- A. 維護隔離記錄，以便執法部門在收到傳票時輕鬆檢閱。
- B. 將這些客戶分配給指定的私人銀行家，以便更好地監控他們的離岸交易。
- C. 執行強化盡職調查，包括強化對帳戶活動的持續監控。
- D. 在建立關係之前尋求董事會的批准。

Answer: (SHOW ANSWER)

According to the Basel Committee on Banking Supervision, banks should apply a risk-based approach to customer due diligence, which means that they should adopt enhanced measures for higher-risk customers and simplified measures for lower-risk customers. Enhanced due diligence (EDD) may include obtaining additional information on the customer's identity, source of funds, business activities, beneficial owners, and expected transactions, as well as conducting more frequent and intensive monitoring of the account activity.

EDD is especially important for customers who are politically exposed persons (PEPs), who are from or have connections with high-risk countries or jurisdictions, or who are involved in high-risk industries or sectors.

Therefore, performing EDD including enhanced ongoing monitoring of the account activity is the correct way for banks to deal with high-risk customers.

Basel Committee on Banking Supervision, CAMS Study Guide, 6th Edition, Chapter 4, page 121.

Reference: <https://www.bis.org/bcbs/basel3.htm>

NEW QUESTION: 46

一家金融機構的美國分行收到執法部門的傳票，要求其提供客戶帳戶活動的詳細記錄。該客戶目前正在接受一項針對洗錢活動的調查。同時，該機構也收到另一家銀行根據金融犯罪執法局(FinCEN) 314(b) 發出的資訊共享請求，要求其提供與同一客戶相關的交易詳情。合規團隊的任務是同時回應傳票和金融犯罪執法局 (FinCEN) 314(b) 請求。

在確保滿足所有法律和監管義務的同時，合規官在回應這些請求時應優先考慮什麼？

- A. 通知客戶其他金融機構的資訊共享請求，並在回應前徵求他們的同意。
- B. 諮詢機構的法律顧問以驗證傳票，然後直接回應執法部門，同時確保所有文件都得到妥善記錄。
- C. 首先回應 FinCEN 314(b) 請求，因為它允許與合作夥伴組織自願分享訊息。
- D. 立即向執法部門和其他金融機構提供所要求的記錄，以確保充分合作和透明度。

Answer: (SHOW ANSWER)

- * B: When a subpoena is received, the institution should first consult with legal counsel to ensure the validity and scope of the subpoena. Compliance with law enforcement requests is mandatory and subject to strict legal obligations. All documentation and responses should be properly recorded.
- * "A subpoena requires a legal response; consult legal counsel to validate the request and respond as required by law."
- * FinCEN 314(b) information-sharing requests are voluntary and can proceed only after fulfilling required legal steps, such as verifying membership in the program and ensuring information-sharing agreements are in place.
- * CAMS 6th Edition clarifies that "under no circumstances should a customer be notified of a law enforcement inquiry or subpoena." References:
CAMS 6th Edition, Law Enforcement Inquiries and Subpoenas
FFIEC BSA/AML Manual, Information Sharing (Sections 314(a) & 314(b))

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NEW QUESTION: 47

除了監控可疑活動之外，電子監控系統還有什麼價口？

- A. 辨識客口如何使用口品
- B. 突顯系統分析師的技能
- C. 向董事會證明金融情報機構正在履行其職責
- D. 滿足系統實施的強制性監管要求

Answer: (SHOW ANSWER)

"Transaction Monitoring Systems and Ongoing Monitoring: Since the transactional monitoring system is key to mitigating ML risk within the bank, the Committee recognizes that AML risks require more than just appropriate policies and procedures; banks must have adequate and appropriate monitoring systems. For most banks, this will involve an IT monitoring system. If the bank does not believe it needs an IT monitoring system, it should document the rationale for why it does not need one.

NEW QUESTION: 48

外國資口管制辦公室制裁的域外功能是什麼？

- A. 中斷埃爾與第三國的經濟與金融關係
- B. 實施有針對性的措施，例如武器禁運 旅行禁令以及金融或商品限制
- C. 禁止交易並要求凍結指定人員和組織的資口
- D. 要求金融服務業的所有適當部門報告潛在的洗錢活動

Answer: (SHOW ANSWER)

The Office of Foreign Assets Control (OFAC) sanctions are extraterritorial in nature, meaning that they apply beyond the national borders of the United States. OFAC sanctions are intended to restrict transactions and the movement of assets between the U.S. and designated persons and organizations. These sanctions are imposed to disrupt the economic and financial relations between foreign countries and designated persons, organizations, or countries. These sanctions include prohibiting transactions, requiring the blocking of assets, and implementing targeted measures such as arms embargoes, travel bans, and financial or commodity restrictions.

NEW QUESTION: 49

類似金額的傳出國外交易會觸發對客戶帳戶的監控警報。在評估帳戶期間，銀行發現電匯金額非常小，並且發生在長期不活動後的過去 3 個月。電匯似乎來自法律來源。為了評估恐怖主義融資的潛力，該機構必須確保

- A. 帳戶持有人出示資金合法的證明。
- B. 轉移的受益人不在恐怖份子觀察名單上。
- C. 轉讓受益人不包含在透明國際名單中。
- D. 帳戶持有人不居住在美國國務院列入恐怖主義支持者名單的國家。

Answer: (SHOW ANSWER)

This is the correct answer because the institution must ensure that the beneficiaries of the transfers are not on a terrorist watch list, such as the United Nations Security Council Consolidated List, the U.S. Treasury Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List, or the European Union Terrorism List. These lists contain the names of individuals, entities, and groups that are subject to sanctions or other measures due to their involvement or association with terrorism or terrorist financing. The institution must screen the beneficiaries of the transfers against these lists and report any matches or hits to the relevant authorities. Failing to do so may expose the institution to legal, regulatory, or reputational risks, as well as facilitate the financing of terrorism.

ACAMS CAMS Certification Video Training Course1, Module 3: International AML/CTF Standards, Lesson

3.2: International AML/CTF Standards

ACAMS CAMS Study Guide, 6th Edition2, Chapter 3: International AML/CTF Standards, Section 3.2: International AML/CTF Standards, pp. 57-58

ACAMS CAMS Examination Preparation Seminar, 6th Edition3, Chapter 3: International AML/CTF Standards, Section 3.2: International AML/CTF Standards, Slide 12

NEW QUESTION: 50

哪些代理銀行風險因素會增加代理銀行的風險？

- A. 在全球開展業務的跨國金融機構
- B. 提供客戶國際資金轉賬
- C. 貨幣服務企業的主要服務供應商
- D. 向高風險司法管轄區的客戶提供有限的產品

Answer: (SHOW ANSWER)

Correspondent banking is a service that allows banks to access financial services in different jurisdictions through intermediary banks, known as correspondent banks. Correspondent banking can facilitate cross-border transactions, foreign exchange, and other financial activities for banks and their customers. However, correspondent banking also poses various risks, such as money laundering, terrorist financing, fraud, corruption, tax evasion, and sanctions evasion. Correspondent banks may have no direct relationship with the customers of the respondent banks, making it difficult to verify their identity and monitor their transactions.

Correspondent banks may also rely on the compliance programs of the respondent banks, which may not meet the standards of the correspondent banks' jurisdictions.

One of the risk factors that increases the risk for a correspondent bank is being a major service provider to money service businesses (MSBs). MSBs are entities that provide money transmission, currency exchange, check cashing, prepaid cards, and other similar services. MSBs are often considered high-risk customers, because they may serve as conduits for illicit funds, especially if they operate in jurisdictions with weak anti-money laundering regulations or oversight. MSBs may also have a large and diverse customer base, making it challenging to conduct customer due diligence and transaction monitoring. Therefore, correspondent banks that provide services to MSBs may face higher exposure to money laundering and other financial crimes, and may need to apply enhanced due diligence and risk mitigation measures.

Understanding Risk in Correspondent Banking

GUIDANCE ON CORRESPONDENT BANKING SERVICES

Correspondent Bank: Definition and How It Works

Correspondent banking - why it's important to understand the risks

Reference: <https://www.fatf-gafi.org/media/fatf/documents/reports/Guidance-Correspondent-Banking-Services.pdf>

NEW QUESTION: 51

負責接收、分析和傳播金融資訊揭露的國家金融情報機構應考慮成為哪個組織的成員？

- A. 埃格蒙特集團
- B. 沃爾夫斯堡集團
- C. 金融行動特別工作小組
- D. 巴塞爾委員會

Answer: A (LEAVE A REPLY)

it describes the organization that a national Financial Intelligence Unit (FIU) should consider becoming a member of, which is the Egmont Group. The Egmont Group is an international network of FIUs that was established in 1995 to facilitate the exchange of financial intelligence and information among its members, and to promote cooperation and coordination in the fight against money laundering and terrorist financing.

The Egmont Group currently has 166 member FIUs from different jurisdictions, and provides them with various benefits, such as access to secure communication channels, best practices, training, and technical assistance. The Egmont Group also works closely with other international organizations, such

as the Financial Action Task Force (FATF), the United Nations, and the World Bank, to enhance the global anti-money laundering and counter-terrorist financing (AML/CTF) framework.

The other options are not necessarily organizations that a national FIU should consider becoming a member of, although they may have some relevance or influence on the AML/CTF field. Option B describes the Wolfsberg Group, which is an association of 13 global banks that was formed in 2000 to develop standards and guidance for the financial industry on AML/CTF and other financial crime issues. The Wolfsberg Group is not an organization for FIUs, but rather for financial institutions. Option C describes the Financial Action Task Force (FATF), which is an inter-governmental body that was established in 1989 to set the international standards and recommendations for AML/CTF and to monitor the compliance and effectiveness of its members and other jurisdictions. The FATF is not an organization for FIUs, but rather for governments and policy-makers. Option D describes the Basel Committee, which is a forum of central bank governors and heads of banking supervision authorities from 28 jurisdictions that was established in 1974 to enhance the quality and consistency of banking supervision and regulation. The Basel Committee is not an organization for FIUs, but rather for banking regulators and supervisors.

ACAMS CAMS Certification Video Training Course - 6th Edition¹

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)² ACAMS CAMS Study Guide - 6th Edition, Chapter 5, pages 108-109

<https://www.acams.org/wp-content/uploads/2019/09/ACAMS-CAMS-Study-Guide-6th-Edition-Chapter-5.pdf>

NEW QUESTION: 52

哪一種口品被認為洗錢風險最高？

- A. 信用卡
- B. 儲蓄帳口
- C. 定期存款帳口
- D. 國際電匯

Answer: (SHOW ANSWER)

International wire transfers are considered to be of highest money laundering risk because they can facilitate the rapid and anonymous movement of funds across borders and jurisdictions, making it difficult for law enforcement and regulators to trace the origin and destination of the funds, and to identify the beneficial owners and controllers of the accounts involved. International wire transfers can also be used to layer and integrate illicit proceeds into the legitimate financial system, by disguising the source, ownership, and purpose of the funds. International wire transfers can involve multiple intermediaries, complex payment chains, and inconsistent or incomplete information, which can increase the risk of money laundering and terrorist financing. Therefore, international wire transfers are subject to enhanced due diligence, record-keeping, and reporting requirements under various anti-money laundering and counter-terrorist financing (AML/CTF) regulations and standards, such as the Financial Action Task Force (FATF) Recommendations¹, the European Union (EU) Funds Transfer Regulation², and the United States (US) Bank Secrecy Act³.

1: FATF (2012), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, FATF, Paris, France, Recommendation 16 and Interpretive Note to Recommendation 16. 2:

Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006 (OJ L 141, 5.6.2015, p. 1) 4 3:

31 U.S.C. 5311-5330 and 31 C.F.R. Chapter X

V

You cannot make international money transfers unless the money is credited to the account. So first priority saving account, subsequent risk international wire transfer

"A savings account, as well as a checking account, can be one of the riskiest financial instruments for money laundering operations given the ease with which it can be opened and operated".

NEW QUESTION: 53

A 國的一家公司服務提供者為 B 國的客戶建立了公司結構，B 國因腐敗而聞名。公司結構包括一家位於 A 國的控股公司，並在該國的一家國際銀行設有銀行帳戶。在入職期間，客戶的財富估計為 752 萬美元。此後不久，客戶的父親成為 B 國總統。兩年後，在例行客戶審閱中，發現客戶的財富已成長至 1 億美元。哪兩個危險訊號顯示洗錢或金融恐怖主義？（選兩個）

- A. 財富在短時間內大幅成長。
- B. 顧客來自一個以貪腐聞名的國家。
- C. 客戶是一位來自以腐敗聞名的國家的政界人士的家庭成員。
- D. 控股公司位於 A 國，在其中一家國際銀行設有銀行帳戶。
- E. 客戶帳戶已有 2 年沒有接受審核。

Answer: (SHOW ANSWER)

According to the Financial Action Task Force (FATF), substantial growth in wealth during a short period of time is a red flag for money laundering or terrorist financing. Additionally, when a client is a family member of a politically exposed person (PEP) from a country known for corruption, it raises concerns about the potential for corruption, bribery, or influence peddling. In this case, the client's father became the president of Country B, which makes him a PEP.

Reference: Certified Anti-Money Laundering Specialist (CAMS) Study Guide, 6th Edition, page 185-186.

NEW QUESTION: 54

反洗錢培訓計畫應包括哪些要求？

- A. 新出納員應在第一年後接受有關識別可疑或異常活動的訓練。
- B. 新貸款人員應接受有關準備貨幣交易報告的年度培訓。
- C. 新員工應在員工入職訓練期間或不久後接受有關銀行政程序的訓練。
- D. 新的營運人員應在受聘後不久接受有關貨幣交易報告豁免的培訓。

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) study guide, an AML training program should include the requirement that new staff receive training during employee orientation or shortly thereafter on bank procedures. This is because new staff need to be aware of the bank's policies and procedures for complying with the money laundering regulations, such as customer due diligence, transaction monitoring, record-keeping, and reporting of suspicious activities. Training new staff as soon as possible also helps to reduce the risk of human errors or oversights that could facilitate money laundering or terrorist financing.

ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 143

ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 144

Technical factsheet Anti-money laundering (AML) training: frequently asked questions, page 1

NEW QUESTION: 55

一家大型跨國銀行聘用了反洗錢專家。該銀行計劃設立一個國際部門，負責將服務擴展到各國。新的國際部門負責人已要求專家評估與銀行擴張計劃相關的風險。應包含下列哪些材料作為參考？

1. 美國愛國者法案
2. 金融行動特別工作小組 40 項建議
3. 巴塞爾銀行監理委員會發布的銀行客戶盡職調查
4. 埃格蒙特集團宗旨聲明

A. 僅限 1、2 和 3

B. 限 1、2 和 4

C. 僅限 1、3 和 4

D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

The Financial Action Task Force (FATF) 40 Recommendations are the international standards for combating money laundering and terrorist financing, and they apply to all countries and financial institutions. The Customer Due Diligence for Banks issued by the Basel Committee on Banking Supervision provides guidance on how banks should conduct CDD and KYC procedures, and how they should manage the risks of correspondent banking and wire transfers. The Egmont Group Statement of Purpose outlines the objectives and functions of the Egmont Group, which is an international network of financial intelligence units (FIUs) that exchange information and cooperate in the fight against money laundering and terrorist financing. These three materials are relevant and useful for the bank's expansion plans, as they cover the main aspects of AML

/CFT compliance in different jurisdictions and sectors.

The USA PATRIOT Act is a US-specific legislation that enhances the powers and obligations of US authorities and financial institutions in relation to AML/CFT, but it may not be applicable or appropriate for other countries where the bank intends to operate. Therefore, it is not a necessary reference material for the bank's international department.

FATF 40 Recommendations

Customer Due Diligence for Banks

Egmont Group Statement of Purpose

NEW QUESTION: 56

監控系統已觸發警報，並已展開調查。該活動涉及將大量現金存入個人帳戶，並在同一天將資金轉移到離岸銀行。進一步調查顯示，該個人帳戶在過去6個月內活動量較低，資金已轉入慈善組織的帳戶。合規官下一步應採取下列哪一項措施？

- A. 禁止與慈善組織進行進一步的交易。
- B. 對慈善機構的受託人進行強化的盡職調查。
- C. 將慈善組織列入銀行內部「觀察名單」。
- D. 向主管機關提交可疑交易報告。

Answer: (SHOW ANSWER)

The activity described in the question raises several red flags for money laundering, such as large and frequent cash deposits, transfers to offshore jurisdictions, and involvement of a charitable organization that could be a front for illicit funds. The Compliance Officer should file a suspicious transaction report (STR) with the competent authority, such as the Financial Intelligence Unit (FIU), as soon as possible, and provide all the relevant information and documentation to support the suspicion. Filing an STR is a legal obligation for financial institutions and does not require the consent or notification of the customer. The Compliance Officer should also follow the bank's internal policies and procedures for handling such cases, which may include freezing the account, conducting further investigation, or escalating the matter to senior management.

ACAMS CAMS Certification Study Guide¹, Chapter 4: Conducting or Supporting the Investigation, Section

4.4: Reporting, pp. 137-139

ACAMS CAMS Certification Video Training Course², Module 4: Conducting or Supporting the Investigation, Lesson 4.4: Reporting ACAMS CAMS Certification Exam Outline³, Domain 4: Conducting or Supporting the Investigation, Task

4.4: File internal and external reports, p. 18

NEW QUESTION: 57

執法部門向一家銀行提交了一份請求，要求提供有關其一名客戶的資訊。根據金融行動特別工作小組的指導，銀行該如何應對？

- A. 提供支持調查所需的所有信息
- B. 確保請求不會違反任何當地隱私法規或法律
- C. 在回應請求之前，確保資訊對於調查是必要的
- D. 聯絡客戶告知調查人員，以確保銀行提供正確的資訊

Answer: (SHOW ANSWER)

According to the ACAMS Study Guide 6th Edition, Chapter 2, page 37, one of the red flags of money laundering or terrorist financing is the use of nominees, trusts, or third parties to hide the identity, ownership, or control of the funds or assets involved in the transaction. Nominees are individuals or entities that act on behalf of the actual or beneficial owners of a company, trust, or account, and may be

used to conceal the source, destination, or purpose of the funds or assets. Nominees may also be used to evade taxes, sanctions, or regulatory requirements.

In this case, the compliance officer is unable to verify the identity of the beneficial owners of the company, and only information on the nominee owners was provided. This raises the suspicion that the company may be involved in money laundering or terrorist financing activities, and that the nominee owners may be acting as fronts or intermediaries for the actual or beneficial owners. The compliance officer should conduct further due diligence on the company, the nominee owners, and the beneficial owners, and report any suspicious or unusual activity to the relevant authorities.

ACAMS Study Guide 6th Edition, Chapter 2, page 37

Beneficial Ownership Meaning and Regulation - Investopedia

What is a nominee shareholder? | LawBite

NEW QUESTION: 58

恐怖分子融資通常青睞哪三種轉移恐怖分子相關資金的管道？選出 3 個答案

- A. 銀行和/或其他正規金融系統
- B. 非正式金融體系
- C. 貨幣兌換公司
- D. 現金快遞員

Answer: (SHOW ANSWER)

Dealers in antiques, precious metals, precious stones, jewelry, and art are advised to follow these practices to reduce the element of money laundering risk:

Verify the identities of all new vendors and customers and conduct due diligence on them. This is to ensure that the dealers know who they are dealing with and can assess the risk level of each customer or vendor. Due diligence may include obtaining and verifying identification documents, checking against sanctions lists or watchlists, obtaining information on the source and purpose of funds, and applying a risk-based approach to the level and frequency of due diligence.

Avoid accepting cash payment from the buyers. This is to prevent the dealers from being used as a conduit for laundering illicit cash or facilitating cash smuggling. Cash transactions are more difficult to trace and may indicate attempts to evade reporting or record-keeping requirements. Dealers should encourage the use of non-cash payment methods, such as bank transfers, cheques, or credit cards, and keep records of all payment transactions.

Insist all vendors submit an appropriate license issued by enforcement agencies authorizing the sale. This is to ensure that the dealers are not involved in the trade of stolen, smuggled, or counterfeit goods, which may be linked to money laundering or other criminal activities. Dealers should verify the authenticity and validity of the licenses and keep copies of them for record-keeping purposes.

FATF Guidance on the Risk-Based Approach for Dealers in Precious Metals and Stones, pages 9-10, 13-14,

17-18, 21-22

AML-CFT Handbook for Dealers in Precious Metals and Stones, pages 25-26, 37-38, 52-53 The anti-money laundering framework for precious stones and metals dealers in Singapore, pages 7-8, 11-12, 15-16

Dealers in Precious Metals, Stones or Jewels Required to Establish Anti-Money Laundering Programs, pages 2-3, 6-7, 10-11

NEW QUESTION: 59

哪個國家機構負責分析和評估其收到的資訊以證實可能存在洗錢或恐怖主義融資活動？

- A. 金融情報機構 (FIU)
- B. 金融行動特別工作小組
- C. 巴塞爾委員會
- D. 沃爾夫斯堡集團

Answer: (SHOW ANSWER)

An FIU is a central, national agency responsible for receiving, analyzing, and disseminating to the competent authorities disclosures of financial information concerning suspected proceeds of crime and potential financing of terrorism or required by national legislation or regulation¹. FIUs play a crucial role in the detection and prevention of money laundering and terrorist financing by collecting, processing, and analyzing financial intelligence and sharing it with domestic and foreign counterparts². FIUs may have different organizational structures, functions, and legal frameworks, but they all adhere to the international standards and best practices set by the Egmont Group of FIUs³.

What We Do | FinCEN.gov

Financial Intelligence Units: An Overview (June 2004) - IMF, page 1

[Egmont Group of Financial Intelligence Units]

Reference: https://www.fatf-gafi.org/media/fatf/content/images/National_ML_TF_Risk_Assessment.pdf

NEW QUESTION: 60

下列何者是非政府組織 (NGO) 打擊洗錢的常用策略？

- A. 幫助金融情報機構 (FIU) 分析可疑活動報告 (SAR)
- B. 直接在法庭上起訴洗錢者
- C. 向政府提供財政援助以加強其反洗錢工作
- D. 提高對洗錢問題及其後果的認識

Answer: (SHOW ANSWER)

* D: NGOs play an important role in raising awareness about money laundering, lobbying for strong AML/CFT laws, and educating the public and stakeholders about the risks and consequences.

* "NGOs help combat money laundering primarily through advocacy, education, and raising public and industry awareness." (CAMS 6th Edition, Role of NGOs in AML/CFT) References:

CAMS 6th Edition, Awareness and Advocacy in AML/CFT

FATF, Outreach to NGOs

NEW QUESTION: 61

一家金融機構因客戶存入大量大額貨幣來償還貸款而提交可疑交易報告。執法人員致電反洗錢官員討論可疑交易報告。法律允許反洗錢官員執行下列哪一項操作？

1. 討論所報告活動的各個面向。

2. 提供客戶貸款文件影本。
 3. 解釋客戶的貸款支付歷史。
 4. 發送可疑交易報告中提到的存款文件。
- A. 僅限 1 和 2
 - B. 僅限 1 和 4
 - C. 僅限 2 和 3
 - D. 僅限 2 和 4

Answer: (SHOW ANSWER)

According to the guidance issued by the Financial Crimes Enforcement Network (FinCEN) and the federal banking agencies, a financial institution is legally permitted to discuss any aspects of the reported activity with the law enforcement officer who contacts them about the suspicious transaction report (SAR), as long as the officer provides appropriate credentials and a written request for the information. The financial institution is also legally permitted to send the deposit documents referenced in the SAR, as they are part of the supporting documentation that may be requested by law enforcement¹ However, the financial institution is not legally permitted to provide copies of the customer's loan documents or explain the customer's loan payment history, as they are not directly related to the reported activity and may contain confidential information that is protected by privacy laws or contractual agreements. The financial institution should only disclose the minimum amount of information necessary to respond to the law enforcement request and should not volunteer any information that is not relevant or requested²

1: Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations, FinCEN and Federal Banking Agencies, 2021, Question 1

2: The best practices for effective Suspicious Activity Reporting, The Payments Association, 2020

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NEW QUESTION: 62

一家銀行收到一張有關其一位客戶的傳票。銀行的金融情報部門應審閱傳票並：

- A. 調整客戶的風險評分並關閉個案。
- B. 提交可疑活動報告 (SAR), 包括SAR 敘述中收到的傳票。
- C. 透過通知客戶傳票來關閉客戶的帳戶。
- D. 執行交易審核並對傳票做出全面回應。

Answer: D (LEAVE A REPLY)

A subpoena is a legal order that requires a person or an entity to produce documents, information, or testimony related to a legal matter. A financial intelligence unit (FIU) is a specialized unit within a financial institution that is responsible for detecting, analyzing, and reporting suspicious activities and transactions.

When a bank receives a subpoena regarding one of its clients, the FIU should review the subpoena and perform a transaction review to determine if there is any evidence of money laundering, terrorist financing, fraud, or other criminal activity involving the client. The FIU should also respond fully to the subpoena by providing the requested information and documents, unless there is a valid reason to object or seek a protective order. The FIU should not adjust the client's risk score, file a SAR, or close the client's account based solely on the receipt of the subpoena, as these actions may be premature, inappropriate, or illegal.

Adjusting the client's risk score may require further investigation and due diligence. Filing a SAR may be unnecessary or misleading if the subpoena does not indicate any suspicious activity. Closing the client's account may violate the bank's contractual obligations, customer service standards, or anti-discrimination laws. Moreover, these actions may alert the client or the subject of the investigation to the existence of the subpoena, which may interfere with the legal process or jeopardize the safety of the bank or its employees.

References:

Subpoena Responses for Financial Institutions

Requests by Law Enforcement for Financial Institutions to Maintain Accounts SUBPOENA COMPLIANCE UPDATE

[ACAMS Study Guide, 6th Edition, Chapter 5, p. 140]

NEW QUESTION: 63

在進行調口時，銀行在與其經紀自營商附屬機構分享客口資訊之前應考慮哪些因素？

- A. 經紀自營商關聯公司是否可以信賴銀行所做的盡職調口
- B. 兩個機構之間是否有司法協助條約
- C. 隱私和資料保護規則是否允許銀行與附屬機構共享資訊
- D. 兩家機構是否都擁有帳口或正在為客口開設帳口

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Certification Study Guide (6th edition), one of the challenges of information sharing within a financial group is the compliance with privacy and data protection rules that may vary across jurisdictions. Therefore, before sharing information about a customer with an affiliate, a bank should consider whether such sharing is permitted by the applicable laws and regulations, and whether the customer has consented to it. The other options are not relevant factors for information sharing in the case of an investigation.

ACAMS CAMS Certification Study Guide (6th edition), page 971; ACAMS CAMS Certification Video Training Course, Module 4, Lesson 22

NEW QUESTION: 64

根據金融行動特別工作小組 40 項建議，從事跨國代理銀行活動的金融機構應採取哪些行動？

- A. 收集政治敏感客戶的列表
- B. ID指擁有或控制超過 5% 股份的自然人士
- C. 在建立關係之前獲得高階管理層的批准
- D. 獲得受訪者反洗錢計畫的第三方獨立審計

Answer: (SHOW ANSWER)

According to the Financial Action Task Force (FATF) 40 Recommendations, financial institutions should obtain senior management approval before establishing new correspondent banking relationships¹. This is to ensure that the financial institution has assessed the money laundering and terrorist financing risks associated with the respondent institution and has applied appropriate due diligence measures. The FATF also requires financial institutions to gather sufficient information about the respondent institution, its business activities, its reputation, its supervision, and its anti-money laundering and counter-terrorist financing policies and procedures¹. Additionally, the FATF recommends that financial institutions document the respective responsibilities of each institution and prevent the use of their accounts by shell banks¹.

1: Guidance on Correspondent Banking Services, FATF, 2016

Reference: <https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf> (15)

NEW QUESTION: 65

實施反洗錢/反恐怖主義融資新技術所面臨的挑戰包括：（選擇四項）

- A. 資料隱私。
- B. 加強盡職調查 (EDD) 政策。
- C. 旅行規則。
- D. 資料品質。
- E. 複雜性。
- F. 監理。

Answer: (SHOW ANSWER)

Key challenges in adopting new AML/CFT technologies are:

* A: Data privacy-new tech often requires processing more personal data, raising privacy/regulatory concerns.

* C: The Travel Rule-meeting global standards for information sharing in payments is a technology challenge.

* D: Data quality-effective systems rely on accurate, comprehensive, timely data.

* E: Complexity-integrating and managing new technology can increase operational complexity.(CAMS 6th Edition, Technology in AML/CFT; FATF Guidance on Digital ID and Fintech) References:

CAMS 6th Edition, AML/CFT Technology and Implementation Challenges

FATF, "Opportunities and Challenges of New Technologies for AML/CFT" (2021)

NEW QUESTION: 66

根據金融行動特別工作小組的口法，用於識別潛在可疑活動的支持文件有哪兩項要求？（選兩個）

- A. 必須保留至少五年
- B. 必須保留至少七年
- C. 必須妥善保存，以便能口及時提供
- D. 只能透過傳票程序向政府發布

Answer: (SHOW ANSWER)

Reference: <https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf>

NEW QUESTION: 67

下列何者最能描述擴散融資的主要威脅之一？

- A. 敵對政府使用複雜的攻擊來威脅關鍵基礎設施和口業，包括金融、醫療保健和能源
- B. 個人和實體組成的網路利用金融系統轉移資金，用於購買大規模殺傷性武器或其零件
- C. 跨國犯罪組織將其活動範圍擴大到更多類型的非法活動，包括人口販運和腐敗
- D. 個人和實體組成的網路，透過全部或部分非法武力或暴力行為籌集資金，進一步擴大其意識形態目標

Answer: (SHOW ANSWER)

Proliferation financing refers to the act of providing financial services or funds for the development, acquisition, or delivery of nuclear, chemical, or biological weapons. The core threat involves networks of individuals and entities using the financial system to obtain sensitive technologies, materials, or knowledge for weapons of mass destruction (WMDs).

The Financial Action Task Force (FATF) identifies this as a major international security threat and requires institutions to assess and mitigate such risks.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Sanctions and Proliferation Financing- Section: Understanding and Identifying Proliferation Risks

NEW QUESTION: 68

哪個主要國際權威機構指定制裁？

- A. 經濟合作口發展組織 (OECD)
- B. 金融行動特別工作小組 (FATF)
- C. 國際貨幣基金組織 (IMF)
- D. 聯合國 (UN)

Answer: (SHOW ANSWER)

The primary international authoritative body that designates sanctions is the United Nations (UN). The UN Security Council has the power to impose sanctions under Chapter VII of the UN Charter, which deals with threats to the peace, breaches of the peace, and acts of aggression. The UN sanctions are legally binding on all UN member states and aim to maintain or restore international peace and security. The UN sanctions can target individuals, entities, groups, sectors, or countries, and can include measures such as arms embargoes, travel bans, asset freezes, trade restrictions, or diplomatic isolation. The UN sanctions are implemented and enforced by the member states, with the assistance of the UN Secretariat and other specialized agencies. The UN sanctions are periodically reviewed and adjusted by the Security Council, based on the reports of the sanctions committees and expert panels.

2: UN Charter, Chapter VII2

3: ACAMS Study Guide for the CAMS Certification Examination3

NEW QUESTION: 69

在金融機構 (FI) 中促進企業範圍內的合規文化的關鍵方面是：

- A. 第一道防線應獨立制定自己的政策。
- B. 創收業務部門應優先於合規性。
- C. 相關資訊應在整個組織內共用。
- D. 合規成本應與收入成比例增加。

Answer: C (LEAVE A REPLY)

An enterprise-wide compliance culture is a centralized, coordinated approach to ethics and compliance program design and assessment that cuts across multiple business units within an organization¹. One key aspect of promoting such a culture is that the relevant information should be shared throughout the organization, so that all employees are aware of the compliance risks, policies, procedures, and expectations, and can act accordingly². Sharing information also facilitates collaboration, communication, and feedback among different functions and levels of the organization, and helps identify and address any gaps or issues in the compliance program³. By contrast, the other options are not conducive to an enterprise-wide compliance culture, as they either create silos, conflicts, or inefficiencies in the compliance function.

1: Enterprise Compliance Risk Management Services | Deloitte US

2: Enterprise Risk Management and Risk Culture - McKinsey & Company

3: FRB: Speech, Bies-Enterprise-wide Compliance Programs-February 4, 2004 Reference:

[https://www.ifc.org/wps/wcm/connect/e7e10e94-3cd8-4f4c-b6f8-1e14ea9eff80](https://www.ifc.org/wps/wcm/connect/e7e10e94-3cd8-4f4c-b6f8-1e14ea9eff80/45464_IFC_AML_Report.pdf?MOD=AJPERES&CVID=mKKNshy)

[/45464_IFC_AML_Report.pdf?MOD=AJPERES&CVID=mKKNshy](https://www.ifc.org/wps/wcm/connect/e7e10e94-3cd8-4f4c-b6f8-1e14ea9eff80/45464_IFC_AML_Report.pdf?MOD=AJPERES&CVID=mKKNshy) (51)

NEW QUESTION: 70

一家小型私人銀行的董事會已要求管理層不再對高淨值人士實施身分要求，以保護他們的隱私。下列哪一項金融行動任務 (FATF) 建議應引起反洗錢專家最關注？

- A. 金融機構不應保留匿名帳戶。
- B. 如果金融機構懷疑資金來自犯罪活動，則應要求他們關閉帳戶。
- C. 金融機構應保存所有必要的國內和國際交易可疑交易報告記錄至少 5 年。
- D. 當與客戶相關的資訊被報告給主管機關時，金融機構不應警告其客戶。

Answer: C (LEAVE A REPLY)

NEW QUESTION: 71

一位客戶經常將大量現金存入線上賭博帳戶，並在很少進行賭博活動後不久要求提款。在賭博和遊戲行業中，與這種行為相關的最可能洗錢風險是什麼？

- A. 客戶試圖將非法資金轉換為「乾淨」的提款
- B. 客戶試圖透過減少賭博活動來避免高額費用
- C. 客戶正在測試遊戲平台的支付系統是否有潛在的詐欺行為

D. 該客戶是高風險賭徒，經常下大注

Answer: (SHOW ANSWER)

In the context of gambling and gaming sectors, a well-known money laundering typology is the use of platforms to introduce illicit funds and withdraw them as "winnings". When a customer deposits large cash amounts and quickly withdraws them without engaging in actual gambling, it indicates "placement and layering" techniques.

This behavior is indicative of attempts to disguise the origin of illicit funds, converting them into legitimate-looking financial flows. It is considered a classic red flag in AML programs related to casinos and online gaming.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Industry-Specific Risks-
Section: Gambling and Gaming Sector Red Flags

NEW QUESTION: 72

當金融機構 (FI) 考慮向虛擬資口服務提供者 (VASP) 提供傳統銀行服務時，應考慮該金融機構是否：（選擇兩個。）

- A. 對虛擬資口有大致的了解。
- B. 持續檢視法定貨幣和虛擬貨幣之間的交易。
- C. 實施增強的 KYC 措施。
- D. 自己擁有虛擬貨幣。

Answer: (SHOW ANSWER)

* A: FIs should ensure they have a general understanding of virtual assets and VASP operations to assess risks accurately.

* C: Enhanced KYC measures are recommended for VASPs due to their higher ML/TF risk profile.

* "FIs must understand the business model and risk of VASPs and apply enhanced due diligence as required by FATF and regulatory guidance." (CAMS 6th Edition, Virtual Assets and VASPs; FATF Guidance) Incorrect:

* B: While monitoring transactions is important, it's not a primary initial consideration for onboarding.

* D: The FI's own holdings are not relevant to due diligence on VASPs.

References:

CAMS 6th Edition, Virtual Assets and VASPs

FATF, Guidance for a Risk-Based Approach to Virtual Assets and VASPs

NEW QUESTION: 73

當局應該採取哪些措施來保護與其他國家交換的反洗錢資訊？

- A. 保護交換的訊息，因為它們會保護從國外來源收到的類似資訊。
- B. 要求與任何存取交換資訊的人簽訂保密協議。
- C. 利用法院系統透過法院命令確保交換資訊的機密性。
- D. 調口完成後銷毀資訊。

Answer: A,B (LEAVE A REPLY)

According to the FATF Recommendation 40, which sets the standards for international cooperation in relation to money laundering, associated predicate offences and terrorist financing, countries should ensure that exchanged information is used only for the purpose for which it was sought or provided, and that any dissemination or use of the information beyond the original scope is subject to prior authorization by the requested competent authority. Moreover, countries should have safeguards in place to ensure that the information exchanged is protected in a manner that is consistent with the way they protect their own information of a similar nature. One of the possible safeguards is to require the use of non-disclosure agreements or other legal instruments to prevent unauthorized access or disclosure of the exchanged information.

= FATF Recommendation 40, Section A.3; Compliance Trends: AML Information Sharing, Section: Cross- border AML information sharing; Safeguarding AML Information Exchanged with Other Countries, Section:

Answers.

Reference: <https://cfatf-gafic.org/index.php/documents/fatf-40r/406fatf-recommendation-40-other-forms-of-international-cooperation>

NEW QUESTION: 74

金融行動特別工作組 (FATF) 式的區域機構的成立，有義務了解其所服務的地區固有的洗錢和恐怖主義融資風險。

他們用來了解這些風險的方法之一是什麼？

- A. 要求成員國制定有關洗錢和恐怖主義融資犯罪的統計指標
- B. 要求其成員的參與金融機構向地區機構提交可疑交易報告
- C. 他們對洗錢和恐怖主義融資趨勢進行全球研究，並在自己的類型報告中報告研究結果
- D. 他們使用 FATF 類型報告所使用的標準和模板，對洗錢和恐怖主義融資方法及趨勢進行區域級研究和分析

Answer: (SHOW ANSWER)

One of the methods that FATF-style regional bodies (FSRBs) use to understand the inherent money laundering and terrorist financing risks in their regions is to conduct regional-level research and analysis of the methods and trends used by criminals and terrorists to exploit the vulnerabilities of the financial system.

This research and analysis is done using the standards and templates developed by the FATF for its typologies reports, which are documents that describe the common features, techniques, and patterns of money laundering and terrorist financing activities. By producing their own typologies reports, FSRBs can identify the specific risks and challenges faced by their member countries and jurisdictions, and provide guidance and recommendations on how to mitigate them.

What are the 9 FATF-Style Regional Bodies (FSRBs)? - Sygna, What are FATF and FSRB typologies? FATF-Style Regional Bodies (FSRBs) - Asia/Pacific Group on Money Laundering, What are the main duties of FSRBs?

Financial Action Task Force - Wikipedia, Typologies.

Reference: [https://www.fatf-gafi.org/media/fatf/documents/recommendations/Private-Sector-Information-Sharing.pdf\(18\)](https://www.fatf-gafi.org/media/fatf/documents/recommendations/Private-Sector-Information-Sharing.pdf(18))

NEW QUESTION: 75

哪三個是最常用的風險標準？

- A. 國家風險
- B. 客戶風險
- C. 聲譽風險
- D. 產品與服務風險

Answer: (SHOW ANSWER)

According to the CAMS Study Guide, the most commonly used risk criteria for assessing the money laundering and terrorist financing risks are country risk, customer risk, and product and service risk. These criteria are based on the FATF Recommendations and the Basel Committee's guidance on sound management of risks related to money laundering and financing of terrorism.

Country risk refers to the level of exposure to potential money laundering and terrorist financing activities in a specific jurisdiction, based on factors such as the quality of its AML/CFT regime, its level of corruption, its political and economic stability, its involvement in illicit activities, and its cooperation with international bodies.

Customer risk refers to the level of exposure to potential money laundering and terrorist financing activities associated with a specific customer or customer segment, based on factors such as the nature and purpose of the business relationship, the source and destination of funds, the type and volume of transactions, the customer's profile and behavior, and the customer's geographic location.

Product and service risk refers to the level of exposure to potential money laundering and terrorist financing activities associated with a specific product or service offered by a financial institution, based on factors such as the complexity, transparency, anonymity, and accessibility of the product or service, the delivery channels and payment methods used, and the degree of oversight and monitoring applied.

Reputation risk is not a risk criterion for assessing the money laundering and terrorist financing risks, but rather a potential consequence of failing to manage those risks effectively. Reputation risk refers to the potential damage to the public trust and confidence in a financial institution due to its involvement or association with money laundering and terrorist financing activities, whether directly or indirectly.

CAMS Study Guide, 6th Edition, Chapter 2: Risk Assessments, pp. 41-461

FATF Recommendations, Recommendation 1: Assessing Risks and Applying a Risk-Based Approach
Basel Committee on Banking Supervision, Sound management of risks related to money laundering and financing of terrorism, June 2017, pp. 9-143

NEW QUESTION: 76

金融機構在遵守制裁要求時應採取哪些步驟？

- A. 對制裁名單上的禁止實體加強盡職調查。
- B. 董事會批准此決定後，凍結指定個人和實體的資金或資產。
- C. 採用自動篩選系統來偵測指定的人員和實體。
- D. 如果現有客戶成為受制裁實體，則將風險狀況變更為「高風險」並繼續監控進一步的交易。

Answer: (SHOW ANSWER)

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NEW QUESTION: 77

反洗錢顧問審核銀行目前的反洗錢政策、程序和控制措施。該銀行為高收入、高淨口客口提供服務，其中包括非居民和離岸企業。在審口自訂名單時，反洗錢顧問確定他和銀行有共同的客口。該銀行的書面反洗錢計畫包括銀行確定與其開展業務的人員身分的流程，但沒有涉及對客口帳口活動的監控。顧問應向銀行推薦：

- A. 繼續遵循現行書面反洗錢計畫。
- B. 著重高風險客口接受程序。
- C. 降低共同客口的風險評級。
- D. 修改程序以更好地評估持續的客口活動。

Answer: (SHOW ANSWER)

According to the ACAMS Study Guide, an effective AML program should include four key elements: internal controls, independent testing, designated compliance officer, and training¹. Internal controls are policies, procedures, and processes that help prevent, detect, and report money laundering and terrorist financing activities. One of the essential components of internal controls is customer due diligence (CDD), which involves identifying and verifying the customer, understanding the nature and purpose of the customer relationship, and conducting ongoing monitoring of customer transactions and risk profiles². Ongoing monitoring is crucial for detecting and reporting suspicious activities, updating customer information, and reassessing customer risk ratings³.

In this case, the bank's written AML program does not address monitoring of customer account activity, which is a significant gap in its internal controls. The bank serves high-income, high net-worth clients who include non-residents and offshore businesses, which are considered high-risk customers for AML purposes⁴. The bank should have enhanced due diligence (EDD) measures for these customers, such as obtaining additional information, conducting more frequent reviews, and applying stricter transaction limits⁵.

The fact that the consultant and the bank have mutual clients does not affect the risk rating or the due diligence requirements of those customers. Therefore, the consultant should recommend the bank to revise its procedures to better assess ongoing customer activity and comply with the AML standards.

1: ACAMS Study Guide, Chapter 2: Developing an Effective Anti-Money Laundering Program

2: ACAMS Study Guide, Chapter 3: Conducting Customer Due Diligence

3: ACAMS Study Guide, Chapter 4: Ongoing Monitoring and Suspicious Activity Reporting

4: ACAMS Study Guide, Chapter 5: Identifying High-Risk Customers

NEW QUESTION: 78

有效的反洗錢培訓計畫應包括哪些內容？

- A. 基於計算機的模組對於銀行中的每個職位描述都有不同的標題
- B. 對員工進行隨機測試，以確保正確理解政策
- C. 現實生活中的洗錢範例
- D. 反洗錢法規列表

Answer: (SHOW ANSWER)

An effective anti-money laundering training program should include real-life money laundering examples to illustrate the concepts and strategies for detecting and preventing money-laundering activity. Real-life examples can help employees to understand the risks, methods, indicators, and impacts of money laundering, as well as the roles and responsibilities of different staff members in combating it. Real-life examples can also enhance the engagement, retention, and application of the knowledge gained from the training program.

= The main references for this question are the following sources:

The document titled "Anti-Money Laundering Awareness Training" published by ACAMS. You can access it by clicking [here](#). This document states that "ACAMS AML General Awareness Training equips employees with knowledge of basic anti-money laundering (AML) principles" and that it is "based on real-life industry scenarios with interactive content to help learning stick".

The document titled "Anti-Money Laundering (AML) Training" published by LIMRA. You can access it by clicking [here](#). This document states that "LIMRA's AML training program provides training for insurance and securities producers and home office employees" and that it "uses real-life scenarios to help learners understand how to apply AML principles to their everyday work".

NEW QUESTION: 79

金融機構為客戶辦理抵押貸款。在隨後對貸款進行的內部審閱中，有人指出，用於支持貸款的評估是由不在該機構批准的評估師名單上的評估師進行的。這一例外得到了高級貸款承銷商的批准。審閱人員審閱了同一地區的其他貸款，指出該貸款的價目明顯高於其他可比較房產的價目。反洗錢專家接下來應該推薦下列哪一項？

- A. 確定貸款承銷商是否審閱了評估師執照的有效性。
- B. 就承銷商與評估師之間潛在的共謀關係向當地執法部門發出警報。
- C. 在提交可疑交易報告之前記錄承銷商的行為。
- D. 對評估師進行高端房地產貸款反洗錢合規培訓。

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) resources, one of the red flags for money laundering in real estate transactions is the use of an appraiser who is not on the approved list of the financial institution. This could indicate a possible collusion between the appraiser and the borrower or the underwriter to inflate the value of the property and obtain a higher loan amount. The anti-money laundering specialist should document the underwriter's actions and the reasons for

approving the exception, as well as the discrepancy between the appraised value and the market value of the property. The specialist should then file a suspicious transaction report (STR) to the relevant authorities, as required by the local regulations .

ACAMS Study Guide for the Certified Anti-Money Laundering Specialist (the 6th edition), Chapter 7: Money Laundering Risks and Methods, page 201.

ACAMS Study Guide for the Certified Anti-Money Laundering Specialist (the 6th edition), Chapter 8: Anti- Money Laundering Programs, page 227.

ACAMS Study Guide for the Certified Anti-Money Laundering Specialist (the 6th edition), Chapter 9: Conducting or Supporting the Investigation Process, page 255.

NEW QUESTION: 80

根據金融行動特別工作組 (FATF) 的標準，當金融機構 (FI) 經營所在東道國的最低反洗錢要求低於其所在國的最低反洗錢要求時，FI：

- A. 應始終對其在東道國的分支機構和控股子公司採取額外措施，以管理海外洗錢和恐怖主義融資風險
- B. 需要確保其在東道國的分支機構和控股子公司在東道國法律法規允許的範圍內執行母國的要求。
- C. 需要對東道國分支機構提出更嚴格的要求，無論東道國法律法規是否允許此類行為
- D. 應關閉其在東道國的業務，因為這些國家的最低反洗錢要求不如母國嚴格

Answer: (SHOW ANSWER)

In accordance with Financial Action Task Force (FATF) standards [1][2], when the minimum AML requirements of the host country where a financial institution (FI) operates are less strict than those of the FI's home country, the FI is required to ensure that their branches and majority-owned subsidiaries in host countries implement the requirements of the home country, to the extent that host country laws and regulations permit. This means that the FI should not impose more strict requirements on host country branches, disregarding if host country laws and regulation permit such action, and should not close down its operations in the host countries where minimum AML requirements are less strict than those of the home country. However, the FI should always apply additional measures on their branches and majority-owned subsidiaries in host countries to manage the money laundering and terrorist financing risk overseas.

NEW QUESTION: 81

佛羅裡達州一家金融機構的一名員工懷疑他們的一名同事參與了一個金融投資詐騙集團。有懷疑的員工下一步該採取什麼措施？

- A. 警告 F1 的同事和客戶，該員工可疑的金融投資提議可能是騙局
- B. 在向佛羅裡達州人力資源部門報告之前，詢問他們的同事以確定他們的懷疑是否正確
- C. 向 F1 的直線主管報告可疑員工，以採取必要的措施
- D. 使用人工智慧工具進行開源情報調查，以獲取有關可疑員工活動的更多信息
- E. 使用 FI 的檢舉管道檢舉可疑員工

Answer: (SHOW ANSWER)

NEW QUESTION: 82

影響組織反洗錢風險的外在因素的一個例子是：

- A. 接受新的客口類型。
- B. 特定轄區的政治體制發生變化。
- C. 推出將提供給廣泛客口的新口品。
- D. 為所有客口推出手機銀行。

Answer: (SHOW ANSWER)

Political system changes can have an impact on an organization's AML risk as they can affect the legal and regulatory framework in which the organization operates. For example, changes to the laws or regulations related to AML, or changes in the way in which the government enforces AML regulations, can have an impact on the organization's AML risk by increasing or decreasing the likelihood of it being exposed to AML risk. In addition, changes in the political environment or political stability in a specific jurisdiction can also affect the organization's AML risk.

NEW QUESTION: 83

《美國愛國者法案》允許美國政府對美國境外的金融機構 (FIs) 採取哪些行動？

- A. 允許所有美國監管機構將非美國金融機構列入特別指定國民和被阻止人員名單。
- B. 佛羅裡達州的傳票文件，但在美國不存在。
- C. 吊銷非美國佛羅裡達州在美國以外國家的銀行牌照。
- D. 當個別金融機構不遵守美國法律時對國家/地區進行製裁。

Answer: (SHOW ANSWER)

Section 319(b) of the USA PATRIOT Act authorizes the U.S. government to subpoena records from any foreign bank that maintains a correspondent account in the U.S., regardless of whether the foreign bank has a physical presence in the U.S. or not. The subpoena may request any records relating to the correspondent account or any account at the foreign bank, including records maintained outside the U.S. If the foreign bank fails to comply with the subpoena, the U.S. government may direct any U.S. financial institution to terminate its correspondent relationship with the foreign bank and impose civil penalties.

References:

Bank Records Related to Anti-Money Laundering Programs, FinCEN, accessed February 2024.
How Patriot Act Affects Financial Institutions?, Sanction Scanner, November 2020.

NEW QUESTION: 84

埃格蒙特集團的主要目標是什麼？（選兩個）

- A. 制定旨在防止
- B. 反洗錢 提供金融情報的安全交換平台
- C. 充當全球金融機構的審慎監理者
- D. 作為反腐敗領域的權威機構
- E. 作為全球金融情報機構的聯合機構

Answer: (SHOW ANSWER)

The Egmont Group is an international body of Financial Intelligence Units (FIUs) from around the world. Its primary purpose is to serve as a forum for FIUs to exchange information, and it also sets

international standards for AML/CFT measures. Additionally, the Egmont Group does not serve as a prudential regulator for global financial institutions or as an authoritative body in the field of anti-corruption.

NEW QUESTION: 85

哪些陳述涉及金融情報機構 (FIU) 在國家和國際層面打擊金融犯罪方面的作用？（選三）

- A. 金融情報機構只能在有合理懷疑並得到法院文件證實的情況下進行跨國合作。
- B. 金融情報機構依法有權在公私部門使用各種調口手段。
- C. 金融情報機構所使用的調口技術範圍有限。
- D. 金融情報機構擁有廣泛的財務資訊來評估可疑活動警報。
- E. 金融情報機構只能指揮來自公共部門實體的資料和資訊請求。
- F. 金融情報機構能口與外國同行和國家機構合作。

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Study Guide (the 6th edition), FIUs are central agencies that receive, analyze, and disseminate financial intelligence to support the detection and prevention of money laundering, terrorist financing, and other financial crimes¹. FIUs have different legal powers and functions depending on their type and jurisdiction, but generally they can use various investigative techniques, such as requesting additional information from reporting entities, accessing databases, conducting analysis, and issuing guidance². FIUs also have access to a wide range of financial information, such as suspicious activity reports, currency transaction reports, cross-border cash declarations, and other relevant data sources, to identify and assess potential illicit activities³. Moreover, FIUs can cooperate and exchange information with domestic and foreign counterparts, subject to certain legal and operational safeguards, to facilitate cross-border investigations and prosecutions of financial crimes⁴.

References:

ACAMS CAMS Study Guide (the 6th edition), Chapter 5: The Role of the Financial Intelligence Unit in Combating Money Laundering and Terrorist Financing, pages 153-163
1 What are Financial Intelligence Units (FIUs)? | Dow Jones Financial Intelligence Units - Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism - MONEYVAL - Coe
The role of financial intelligence units in combating money laundering (Chapter 6) - Money Laundering

NEW QUESTION: 86

歐盟國家的一家貴金屬和寶石專業交易商計劃採取措施，降低被濫用於洗錢目的的風險。哪些措施與實現這一目標最相關？（選兩個）

- A. 僅接受與成熟貴金屬公司維護的貴金屬池帳口相關的交易。
- B. 停止接受受益人以外的人的付款。
- C. 限制顧客和員工之間的直接接觸。
- D. 在沒有足口的客口識別資訊的情況下限制接受購買。
- E. 停止接受歐元以外貨幣的現金付款。

Answer: (SHOW ANSWER)

The two most relevant measures for a professional dealer in precious metals and stones to reduce the risk of being misused for money laundering purposes are:

B: Stop accepting payments from persons other than the beneficiary: This measure can help to ensure that the source of funds is legitimate and can be traced back to the customer.

D: Limit the acceptance of purchases without adequate customer identification information: Adequate customer identification information is necessary for the purpose of identifying and verifying the customer's identity and determining whether the customer is a politically exposed person (PEP) or has any other risk characteristics that may require enhanced due diligence measures.

NEW QUESTION: 87

政府制定了新的反洗錢法，要求所有金融機構從客戶那裡獲取某些資訊。位於該司法管轄區的機構應採取哪些步驟來確保合規？

- A. 更改程式以要求取得必要的資訊
- B. 根據需要更改程序和系統並提供員工培訓
- C. 向客戶發送通知，要求他們提供必要的資訊
- D. 更改系統以確保自動從所有客戶獲取所需信息

Answer: ([SHOW ANSWER](#))

According to the CDD Rule, covered financial institutions must establish and maintain written procedures that are reasonably designed to identify and verify beneficial owners of legal entity customers and to include such procedures in their anti-money laundering compliance program¹. These procedures should also be updated as necessary to reflect changes in the law or the institution's risk profile². Moreover, the institution should provide adequate training to its employees on the new requirements and monitor their compliance³.

1: FinCEN Guidance, FIN-2020-G002, August 3, 2020, p. 1

2: Your responsibilities under money laundering supervision - GOV.UK, Section: Customer due diligence requirements

3: Customer identification: Know your customer (KYC) | AUSTRAC, Section: Training and awareness

NEW QUESTION: 88

哪些操作情況可能顯示在存款金融機構或透過存款金融機構正在進行洗錢活動？

- A. 該機構發現其數位產品和服務的採用率增加。
- B. 該機構維護其出售的貨幣工具的連續編號日誌。
- C. 該機構發現顧客對大面額紙幣的需求增加。
- D. 該機構發現支持資金快速流動或匯款的交易服務的結算時間減少。

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 89

某國的金融情報機構 (FIU) 收到一份涉及重大可疑資金轉移的特別報告員報告，這些資金轉移不僅發生在其管轄範圍內，還發生在外國。需要外國提供更多資訊來確定是否需要將此事提交當地起訴。在這種情況下，下列哪一項敘述是正確的？

- A. 國家主權表示資訊不能被外國取得。
- B. 取得來自外國的資訊違反了國際資料保護法。
- C. 任何與洗錢有關的資訊都可能隨時從任何組織收到，無論其管轄範圍如何。
- D. 艾格蒙特集團成員國可以互相要求資訊援助。

Answer: (SHOW ANSWER)

International cooperation is essential in AML investigations, and the Egmont Group facilitates FIU-to-FIU information sharing.

Option D (Correct): Egmont Group members can request and share intelligence for AML investigations under established protocols.

Option A (Incorrect): Sovereignty does not prevent cooperation if proper legal frameworks exist.

Option B (Incorrect): AML regulations permit international data sharing, especially under agreements like Mutual Legal Assistance Treaties (MLATs).

Option C (Incorrect): Data sharing is restricted to authorized entities, not all organizations.

Why This Matters:

Failure to share AML intelligence across borders can enable:

Cross-border money laundering.

Terrorist financing networks to operate undetected.

Regulatory penalties for non-compliance.

Reference:

FATF Recommendation 40 (International Cooperation in AML)

Egmont Group of FIUs Guidelines

Mutual Legal Assistance Treaties (MLATs) on AML Cooperation

NEW QUESTION: 90

一般來說，金融機構或企業不必在反洗錢計畫中具體解決哪些要素？

- A. 口部政策、程序與控制系統
- B. 指定的合規官，對反洗錢計畫進行日常監督
- C. 持續的員工培訓計劃
- D. 針對政府觀察名單篩選問題的 OFAC 計劃的 明

Answer: (SHOW ANSWER)

According to the Bank Secrecy Act (BSA), a financial institution or business must establish an anti-money laundering (AML) program that includes at least four elements: (a) a system of internal policies, procedures and controls to prevent, detect and report money laundering and other illicit activities; (b) a designated compliance officer who is responsible for overseeing the implementation and effectiveness of the AML program; an ongoing employee training program that covers the legal and regulatory obligations, the risks and red flags of money laundering, and the roles and responsibilities of the staff in the AML program; and (d) an independent audit function that tests and evaluates the adequacy and compliance of the AML program¹².

While the Office of Foreign Assets Control (OFAC) is a key agency that enforces economic and trade sanctions against targeted foreign countries, entities and individuals, it is not part of the BSA or the AML program requirements. However, financial institutions and businesses are expected to comply with

OFAC regulations and screen their customers and transactions against the OFAC lists of sanctioned parties. Failure to do so may result in civil or criminal penalties³⁴. Therefore, it is advisable for financial institutions and businesses to have an OFAC program that is integrated with their AML program, but it is not a mandatory element that they have to specifically address in their AML program.

1: Financial Crimes Enforcement Network (2020). Anti-Money Laundering Programs

2: ACAMS (2020). CAMS Certification Package (6th Edition)

3: Office of Foreign Assets Control (2023). Sanctions Programs and Country Information

4: Moses & Singer LLP (2023). Anti-Money Laundering, Bank Secrecy and OFAC Regulations

NEW QUESTION: 91

FATF 建議在客戶盡職調查 (CDD) 計劃中納入一些措施，包括：

- A. 對產品和服務進行風險評估。
- B. 對業務關係進行持續的盡職調查並監控交易。
- C. 辨識產品和服務及其對顧客的適合性。
- D. 辨識受益所有人的數量，無需驗證其真實身分。

Answer: (SHOW ANSWER)

According to the FATF Recommendation 10, financial institutions should conduct ongoing due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the institution's knowledge of the customer, their business and risk profile, including, where necessary, the source of funds. This is one of the core measures of customer due diligence (CDD) that aim to prevent and detect money laundering and terrorist financing risks.

= The main reference for this question is the document titled "International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation - The FATF Recommendations" published by the FATF in February 2018. You can access it by clicking here. You can also find more information about the CDD measures and the risk-based approach on the FATF website, the CFATF website, the Central Bank of Ireland website, and the Medium blog.

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NEW QUESTION: 92

合規分析師正在審查一家上市公司與一家高風險司法管轄區的公司之間的近期活動。哪些細節顯示升級是有必要的？

- A. 該活動對金融機構造成聲譽風險。

- B. 發起人第一次向收款人電匯。
- C. 受益人活躍於相關口業。
- D. 支付給受益人的金額較大。

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Certification Study Guide (6th edition), one of the red flags for money laundering is the transfer of large sums of money to or from high-risk jurisdictions, especially if the transactions are inconsistent with the customer's profile or business activity. Large payments to a beneficiary in a high-risk jurisdiction may indicate that the originator is involved in illicit activities such as tax evasion, fraud, corruption, or terrorism financing. Therefore, such payments should be escalated for further investigation and reporting¹

1: ACAMS CAMS Certification Study Guide (6th edition), page 64.

NEW QUESTION: 93

匯款業務很可能會吸引洗錢者，因為它

1. 以現金交易為主。
2. 從事國際交易。
3. 為上門客口辦理交易。
4. 不必遵守交易報告。

- A. 僅限 1、2 和 3
- B. 限 1、2 和 4
- C. 僅限 1、3 和 4
- D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

A money remittance business will most likely attract money launderers because it deals primarily in cash transactions, engages in international transactions, and conducts transactions for walk-in customers. These factors make money remittance businesses vulnerable to money laundering risks, such as:

Cash transactions: Cash is the preferred medium of exchange for money launderers, as it is anonymous, untraceable, and easily convertible. Money remittance businesses often deal with large amounts of cash, which can be used to place, layer, or integrate illicit funds into the financial system. Cash transactions also pose challenges for customer identification, record keeping, and transaction monitoring.

International transactions: Money remittance businesses facilitate cross-border transfers of funds, which can be used to move illicit funds from one jurisdiction to another, or to obscure the origin, destination, or purpose of the funds. International transactions also involve exposure to different legal, regulatory, and cultural environments, which may create inconsistencies or gaps in anti-money laundering (AML) and counter- terrorism financing (CTF) standards and practices.

Walk-in customers: Money remittance businesses often serve walk-in customers, who may not have an established relationship with the business, or who may use false or incomplete identification documents.

Walk-in customers also increase the volume and complexity of transactions, which may make it difficult to detect suspicious or unusual activity, or to apply risk-based due diligence measures.

ACAMS CAMS Certification Video Training Course¹, Module 2: Money Laundering Risks and Methods, Lesson 2.3: Money Laundering Risks and Methods by Sector ACAMS CAMS Study Guide, 6th Edition², Chapter 2: Money Laundering Risks and Methods, Section 2.3:

Money Laundering Risks and Methods by Sector, pp. 37-38

ACAMS CAMS Examination Preparation Seminar, 6th Edition³, Chapter 2: Money Laundering Risks and Methods, Section 2.3: Money Laundering Risks and Methods by Sector, Slide 16

NEW QUESTION: 94

關於 2012 年金融行動特別工作小組 (FATF) 的 40 項建議和/或 11 項直接成果，下列哪一項敘述是正確的？

- A. 11 項直接成果是針對需要加強監控的高風險司法管轄區提出的建議。
- B. 40 項建議尚未更新以反映新技術的影響
- C. 40 項建議的基石是每個司法管轄區採用基於風險的方法
- D. 各司法管轄區均可聯絡 FATF，私下取得 40 項建議的解釋性口明

Answer: (SHOW ANSWER)

NEW QUESTION: 95

經營進出口業務的獲利商業客戶在同一機構不同地點的分公司擁有多個帳戶。根據透明國際評級，客戶從被視為高度腐敗的司法管轄區接收資金。客戶在帳戶之間頻繁轉賬，更願意單獨管理帳戶。機構應該採取什麼措施來降低與這些帳戶相關的風險？

- A. 提交可疑交易報告
- B. 降低透明國際主觀評等的重要性
- C. 進行交易價格操弄分析
- D. 發展一個系統來監控所有活動

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) resources, the institution should develop a system to monitor all the activity of the customer's accounts to mitigate the risk associated with these accounts. This is because the customer's behavior and profile may indicate some red flags of money laundering, such as:

Operating an import-export business, which is a common sector for trade-based money laundering, where trade transactions are used to disguise the movement of illicit funds, either by over- or under-invoicing, misrepresenting the quantity or quality of goods, or falsifying documents¹.

Receiving funds from a jurisdiction perceived as highly corrupt, which may increase the risk of the funds being derived from bribery, embezzlement, fraud, or other predicate offences². Transparency

International is a global civil society organization that publishes an annual Corruption Perceptions Index, which ranks countries by their perceived levels of public sector corruption based on expert assessments and surveys³.

Making frequent transfers among the accounts, which may indicate a layering technique, where funds are moved through multiple accounts, institutions, or jurisdictions to obscure the audit trail and the source and ownership of the funds⁴.

Preferring to manage the accounts separately, which may indicate a lack of transparency or an attempt to avoid detection or reporting by the institution.

By developing a system to monitor all the activity of the customer's accounts, the institution can:
Identify and verify the identity and beneficial ownership of the customer and the parties involved in the transactions.

Obtain and verify information on the nature and purpose of the business relationship and the source and destination of the funds.

Conduct a risk assessment of the customer and the transactions based on the customer's profile, behavior, and geographic locations.

Apply enhanced due diligence and ongoing monitoring measures for higher-risk customers and transactions, such as obtaining additional information, documentation, or approval, or conducting more frequent or in- depth reviews.

Detect and report any suspicious or unusual transactions or activities to the relevant authorities.

The other three options are incorrect because:

File a suspicious transaction report is not the best answer, as it is a reactive measure that should be taken after the institution has identified or suspected money laundering or terrorist financing activity, not before. The institution should first conduct due diligence and monitoring of the customer and the transactions, and then file a report if there are reasonable grounds to believe that the activity is suspicious or unusual.

Diminish the importance of the subjective Transparency International rating is not the best answer, as it is a complacent and irresponsible attitude that may expose the institution to legal, regulatory, reputational, or operational risks. The Transparency International rating is not subjective, but based on credible sources and methodologies, and it is widely used as a reference by governments, businesses, civil society, and the public to assess the level of corruption in different countries³. The institution should not ignore or downplay the rating, but rather use it as one of the factors to evaluate the risk of the customer and the transactions.

Conduct a trade-price manipulation analysis is not the best answer, as it is a specific and technical measure that may not be sufficient or appropriate to mitigate the risk associated with these accounts. A trade-price manipulation analysis is a method of detecting trade-based money laundering by comparing the prices of goods or services in a transaction with the market prices or other benchmarks, and identifying any significant discrepancies or anomalies. However, this measure may not be feasible or effective if the institution does not have access to reliable and comparable data, or if the goods or services are not standardized or homogeneous.

Moreover, this measure may not address other aspects of the risk, such as the identity, ownership, or behavior of the customer and the parties involved in the transactions.

1: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 108 2: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 107 3: Transparency International, Corruption Perceptions Index, 3 4: ACAMS,

CAMS Study Guide, 6th Edition, Chapter 5, p. 106 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 103 :

ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 103 : ACAMS, CAMS Study Guide, 6th Edition,

Chapter 5, p. 104 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 105 : ACAMS, CAMS Study

Guide, 6th Edition, Chapter 5, p. 105 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 109

NEW QUESTION: 96

反洗錢調查員正在審查交易監控警報和客戶過去兩年的歷史檔案。對部落格中的負面新聞搜尋進行審查表明，該客戶以前是恐怖組織的成員。哪些活動需要進一步升級？（選兩個）

- A. 客戶在多筆交易中將款項匯入公認的慈善非營利組織的帳戶。
- B. 客戶在去年購買和出售了多處房地產。
- C. 帳戶中的信用交易主要與薪資和房租收入有關。
- D. 該帳戶收到大量現金存款，然後有系統地透過自動櫃員機(ATM)提款，直到餘額達到名義餘額。
- E. 客戶定期進行多次現金交易，與客戶的職業不符。

Answer: (SHOW ANSWER)

1. D. The account received a large cash deposit followed by systematic automated teller machine (ATM) withdrawals until the balance was nominal.

This pattern of behavior, known as "structuring" or "smurfing," is often associated with money laundering.

The large cash deposit followed by smaller withdrawals in a systematic manner raises red flags and requires further investigation.

2. E. The customer conducts multiple cash transactions on a regular basis which do not match the customer's occupation.

Conducting frequent cash transactions that do not align with the customer's stated occupation or income source is suspicious. It suggests potential attempts to hide the true origin of funds or evade reporting requirements¹.

D). Large Cash Deposit Followed by ATM Withdrawals:

The large cash deposit followed by systematic ATM withdrawals is indicative of structuring, a common money laundering technique. Structuring involves breaking down large sums of money into smaller transactions to avoid detection. In this case, the customer's behavior warrants further scrutiny to determine the purpose behind these transactions.

E). Inconsistent Cash Transactions:

When a customer conducts multiple cash transactions that do not align with their stated occupation or income source, it raises suspicions. Such behavior may indicate an attempt to obscure the true origin of funds or evade reporting requirements. Investigating the reasons behind these inconsistent cash transactions is essential to assess potential money laundering risks¹.

References: 1: Anti-Money Laundering Specialist (6th edition), ACAMS, Chapter 3: "Money Laundering and Terrorist Financing Methods," Section 3.1.2: "Structuring," and Section 3.1.3: "Inconsistent Cash Transactions."

NEW QUESTION: 97

金融機構 (FI) 進行調查的主要目標是什麼？

- A. 及時更新政策和程序
- B. 保留所有文檔
- C. 了解客戶
- D. 追蹤資金流動

Answer: (SHOW ANSWER)

The main objective when a financial institution (FI) conducts an investigation is to track the movement of the money. Money laundering is a process of disguising the proceeds of criminal activity to make them appear legitimate. The movement of money is an essential element in the process of money laundering. Therefore, tracking the movement of funds is a crucial step in identifying and preventing money laundering. A financial institution must be able to recognize suspicious transactions and report them to the relevant authorities. An investigation is conducted to gather evidence and establish a clear understanding of the transaction flow, the parties involved, and the nature of the activity. This information is used to determine if the transaction is suspicious and if it violates any laws or regulations. While keeping policies and procedures updated, keeping documentation, and knowing the customer are essential components of a comprehensive anti-money laundering (AML) program, these activities are not the primary objective of an investigation. Policies and procedures need to be updated to reflect changes in regulatory requirements and emerging money laundering risks. Documentation must be retained to provide evidence of the investigation process and outcomes. Knowing the customer is essential to identify and verify the customer's identity and assess the risk associated with the relationship.

ACAMS Study Guide for the CAMS Certification Examination - 6th Edition, Chapter 3: AML Programs, Section 3.2: AML Program Components, Subsection 3.2.4: Transaction Monitoring and Investigation, pp. 87-

88

Main Objective of Conducting Investigations - exam-answer.com

NEW QUESTION: 98

根據沃爾夫斯堡代理銀行原則，空殼銀行符合哪三個標準？

選出 3 個答案。

- A. 不在其被授權開展業務的司法管轄區的固定地址開展業務。
- B. 它不在其被授權在該地址開展業務或維護營運記錄的固定地址僱用一名或多名人員
- C. 不受要求實施反洗錢計畫的反洗錢法的約束
- D. 不受許可其進行銀行活動的銀行當局的檢查

Answer: (SHOW ANSWER)

According to the Wolfsberg Financial Crime Principles for Correspondent Banking¹, a shell bank is defined as a bank that has no physical presence in the jurisdiction in which it is incorporated and licensed, and which is unaffiliated with a regulated financial group that is subject to effective consolidated supervision. Physical presence means meaningful mind and management located within a country. The existence simply of a local agent or low level staff does not constitute physical presence.

Therefore, a shell bank meets the criteria A, B, and D, as it does not conduct business at a fixed address, does not employ one or more individuals or maintain operating records at that address, and is not subject to inspection by the banking authority that licensed it.

Criterion C is not specific to shell banks, as any bank, whether shell or not, may or may not be subject to AML laws that require it to implement an AML program, depending on the jurisdiction.

Wolfsberg Financial Crime Principles for Correspondent Banking¹, Section: Definitions, pp. 3-4.

NEW QUESTION: 99

與貨幣服務業務相關的洗錢危險信號包括：（選擇兩項）

- A. 第三方以現金支付保單。
- B. 同一客戶在短時間內在多個地點進行交易。
- C. 重複收到虛擬貨幣交易所的資金轉帳。
- D. 員工靠薪水過著奢侈的生活。
- E. 兩個或多個客戶使用相同的身分進行單獨且不相關的交易。

Answer: (SHOW ANSWER)

These two options are indicative of money laundering red flags associated with money service businesses, as they may suggest attempts to avoid reporting requirements, conceal the source or destination of funds, or use false or stolen identities. Money service businesses are vulnerable to money laundering due to the high volume and anonymity of transactions, the ease of cross-border transfers, and the lack of effective regulation and supervision in some jurisdictions¹². Therefore, they should implement robust anti-money laundering policies and procedures, and monitor and report any suspicious activity.

References:

ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 3, page 631

ACAMS CAMS Certification Video Training Course, Module 3, Lesson 42

NEW QUESTION: 100

歐盟對金融機構 (FI) 施加的隱私和資料保護限制要求金融機構必須：（選擇兩個。）

- A. 聘請第三方補充任何缺失的客戶識別資訊。
- B. 應用資料最小化以避免資料收集過度。
- C. 將金融機構調查異常活動後所獲得的任何資訊告知客戶。
- D. 使用機器學習和人工智慧時請遵循嚴格的指導方針。

Answer: (SHOW ANSWER)

Financial institutions operating in the EU must comply with GDPR and AML directives, ensuring a balance between privacy and AML compliance.

Option B (Correct): Data minimization is a key GDPR principle, ensuring that only necessary data is collected and processed.

Option D (Correct): Strict guidelines apply to AI and machine learning models used in AML compliance to prevent bias and ensure transparency.

Why Other Options Are Incorrect:

Option A (Incorrect): FIs cannot use third parties to supplement missing customer identification unless proper KYC measures are followed.

Option C (Incorrect): Customers cannot be informed about ongoing AML investigations due to "tipping off" restrictions under AML laws.

Best Practices for AML Compliance Under GDPR:

Limit data collection to what is necessary for AML compliance.

Ensure AI and machine learning models comply with transparency regulations.

Prevent unauthorized data access through strict internal controls.

Reference:

EU GDPR Article 5 (Principles for Data Processing)

6th EU AML Directive (6AMLD) on Data Protection in AML

Wolfsberg Group Guidance on AI in AML Compliance

NEW QUESTION: 101

沃爾夫斯堡集團第一份指南的主題是什麼？

- A. 加強對高風險客戶的盡職調查
- B. 私人銀行業務
- C. 針對金融機構員工的反洗錢培訓
- D. 商家收單活動

Answer: ([SHOW ANSWER](#))

The Wolfsberg Group is an association of 13 global banks that aims to develop frameworks and guidance for the management of financial crime risks. The group started as a meeting of banks in 1999 to address anti-money laundering (AML) in private banking, which carries an increased degree of risk from a money laundering perspective. In the course of discussions, they articulated principles that reflected uniformly high standards for this client segment. These principles became the first guidance published by the group under the name Wolfsberg Principles.

The Wolfsberg Group - Institute on Governance

Wolfsberg Group - Wikipedia

The Group first came together in 2000 at the Wolfsberg castle in Switzerland, accompanied by representatives of Transparency International, to draft anti-money laundering guidelines for private banking

NEW QUESTION: 102

金融行動特別工作小組 (FATF) 式的區域機構的主要目的是什麼？ (選兩個)

- A. 充當金融機構的審慎監理機構
- B. 為外國代理行提供盡職調查
- C. 為 FATF 政策制定提供專業知識和意見
- D. 對不合作管轄區實施特別措施
- E. 促進 FATF 建議的有效實施

Answer: ([SHOW ANSWER](#))

The primary purposes of Financial Action Task Force (FATF)-Style Regional Bodies are to promote effective implementation of FATF recommendations and to provide expertise and input in FATF policy-making.

(CAMS Manual, 6th Edition, Page 180)

NEW QUESTION: 103

哪些洗錢/恐怖主義融資風險與加密資口有關？（選擇三項）

- A. 貶口
- B. 智能合約漏洞
- C. 匿名的可能性
- D. 全球影響力
- E. 高額交易費
- F. 用於非法資金分層

Answer: ([SHOW ANSWER](#))

Cryptoassets, such as cryptocurrencies, pose specific ML/TF risks due to their technological characteristics and usage patterns:

* Potential for anonymity (C): Cryptoassets allow users to make transactions without revealing their true identities, which hinders law enforcement from tracking illicit activity. The CAMS 6th Edition states: "Cryptoassets can be transferred or exchanged between users without the need for identification, presenting a significant risk due to the potential for anonymity." (CAMS 6th Edition, Chapter: Risks and Methods of Money Laundering and Terrorist Financing, Virtual Assets section)

* Global reach (D): Cryptoassets operate on a global scale, enabling rapid cross-border transfers without the limitations of traditional financial systems. This increases the complexity of monitoring and controlling illicit transactions. "The global nature of virtual assets makes it easy for criminals to move value across borders quickly, evading jurisdictional controls." (CAMS 6th Edition; FATF Guidance on Virtual Assets 2019)

* Use to layer illicit funds (F): The ability to move cryptoassets between numerous wallets and exchanges allows criminals to obscure the source of funds through layering, a key stage of money laundering. "Layering can be achieved by rapidly moving cryptoassets between wallets, exchanges, and across different jurisdictions, making tracing more difficult." (CAMS 6th Edition, Chapter: Risks and Methods of Money Laundering and Terrorist Financing) References:

ACAMS Study Guide 6th Edition, Chapter: Risks and Methods of Money Laundering and Terrorist Financing, Virtual Assets/Virtual Currencies FATF Guidance for a Risk-Based Approach to Virtual Assets (2019) EU 5th AML Directive (2018/843)

NEW QUESTION: 104

一名高級政府官員正嘗試在一家金融機構 (FI) 開設帳口，該機構的營運地點與該官員居住地不同。官方正在聘請資口管理中介作為他們的代表。根據沃爾夫斯堡集團的口法，金融機構在開設帳口方面應採取哪些後續步驟？（選三）

- A. 向當局報告政治公眾人物可能正在進行可疑活動。

- B. 僅針對為其開設帳口的人員名下的官員篩選適用的製裁。
- C. 合理確定官員的財富和資金來源是否合法。
- D. 對管理中介執行盡職調口程序。
- E. 確定中間代表是否代表官員行事。
- F. 確保更新官員的客口文件，以便以一致和完整的方式維護資訊。

Answer: C,D,E (LEAVE A REPLY)

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.

References:

- 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: 105

口部調口日誌的主要目的是：

- A. 為反洗錢官員和金融情報部門提供調口訓練。
- B. 追蹤異常活動的調口狀態。
- C. 向董事會報告調口狀態。
- D. 向董事會報告調口狀態。
- E. 偵測並監控可能的可疑活動。

Answer: (SHOW ANSWER)

An internal investigation log is primarily intended to track the status of investigations into unusual activity. This is to ensure that the investigations are conducted in a timely, thorough, and consistent manner, and that the results and recommendations are documented and communicated to the relevant parties¹². An internal investigation log can also help the organization to identify any trends, patterns, or

gaps in its anti- money laundering (AML) compliance program, and to measure its effectiveness and efficiency³.

An internal investigation log is not intended to provide training on investigations to the anti-money laundering officer and Financial Intelligence Unit (FIU), report status of investigations to the Board of Directors, or detect and monitor possible suspicious activity. These are separate functions that may involve the use of the internal investigation log, but are not its primary purpose.

1: How to Conduct Effective AML Investigations - Blog | Unit211 2: BSA/AML Internal Audit: PwC2 3: Anti-Money Laundering: 5 Steps to Conduct an Audit³

NEW QUESTION: 106

關於《美國愛國者法案》的哪些陳述最好地描述了具有域外影響力的關鍵方面？（選擇三項）

- A. 它允許美國司法部長向擁有美國代理帳口（包括位於美國境外的帳口）的外國銀行傳喚記錄
- B. 允許外國銀行自願指定在美國的註冊代理人接受傳票送達。
- C. 它允許財政部長在外國銀行未及時回覆傳票時命令美國金融機構 (FI) 關閉代理帳口。
- D. 當為美國外國銀行開設和維護的代理帳口中的資口被扣押時，它要求政府追蹤資金來源
- E. 它排除了被視為經紀自營商、貨幣轉移商和貨幣兌換商的外國金融機構業務。
- F. 它允許聯邦銀行監管機構要求在美國經營的佛羅裡達州提供外國銀行所有者的身份記錄。

Answer: (SHOW ANSWER)

The USA PATRIOT Act is a comprehensive legislation that was enacted in response to the terrorist attacks of September 11, 2001, and aimed to strengthen the US government's ability to prevent, detect, and prosecute money laundering and terrorist financing. Among its many provisions, the USA PATRIOT Act contains several sections that have extraterritorial reach, meaning that they apply to foreign entities or activities that have a nexus with the US. Three of these sections are:

Section 319(b), which allows for the US Attorney General or the Secretary of the Treasury to issue a subpoena or other legal order to any foreign bank that maintains a correspondent account in the US, requiring the production of records relating to such account or any account at the foreign bank, including records maintained outside the US¹². This section also allows foreign banks to voluntarily designate a registered agent in the US to accept service of such subpoenas or orders¹².

Section 313, which prohibits US financial institutions from establishing, maintaining, administering, or managing correspondent accounts for foreign shell banks, which are banks that have no physical presence in any country and are not affiliated with a regulated financial group³⁴. This section also requires US financial institutions to take reasonable steps to ensure that their correspondent accounts with foreign banks are not being used to provide banking services indirectly to foreign shell banks³⁴.

Section 311, which authorizes the Secretary of the Treasury to designate foreign jurisdictions, financial institutions, classes of transactions, or types of accounts as being of "primary money laundering concern" and to impose special measures to address such concerns. These special measures may include requiring US financial institutions to obtain and retain information on the beneficial owners of foreign accounts, prohibiting or imposing conditions on the opening or maintaining of correspondent or payable-through accounts for foreign financial institutions, or requiring US financial institutions to identify the customers of their foreign correspondent account holders. The Secretary of the Treasury

may also order a US financial institution to terminate a correspondent account within 10 days if the foreign bank fails to comply with a subpoena or other request for information under Section 319(b) .

1: USA PATRIOT Act, Section 319(b)

2: ACAMS, CAMS Certification Package - 6th Edition, Chapter 4, page 121

3: USA PATRIOT Act, Section 313

4: ACAMS, CAMS Certification Package - 6th Edition, Chapter 4, page 120 USA PATRIOT Act, Section 311 ACAMS, CAMS Certification Package - 6th Edition, Chapter 4, page 119 Reference:

<https://www.jonesday.com/-/media/files/publications/2007/10/extraterritorial-application-of-the-usa-patriot-ac>

[/files/extraterritorial-application-of-the-usa-patriot-ac/fileattachment/graves_ganguli.pdf](https://www.jonesday.com/-/media/files/publications/2007/10/extraterritorial-application-of-the-usa-patriot-ac/fileattachment/graves_ganguli.pdf)

<https://www.lawfareblog.com/long-arm-us-law-patriot-act-anti-money-laundering-act-2020-and-foreign-banks>

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NEW QUESTION: 107

如何提高那些沒有製裁監管制度的國家的認識？（選兩個）

- A. 限制擁有健全的反洗錢/反恐怖主義融資和製裁監管制度的國家與沒有健全的反洗錢/反恐怖主義融資和製裁監管制度的國家之間的貿易。
- B. 這些國家口舉辦的 AFC（反金融犯罪）和製裁相關研討會網路研討會和培訓。
- C. 針對這些國家的執法和罰款。
- D. 政府間的雙邊對話與合作。

Answer: (SHOW ANSWER)

Many jurisdictions lack robust sanctions frameworks, requiring international cooperation and education to improve compliance.

* Option B (Correct): Educational initiatives such as AML/sanctions training and workshops help raise awareness and build capacity.

* Option D (Correct): Bilateral cooperation allows knowledge-sharing and technical assistance between regulatory authorities.

Why Other Options Are Incorrect:

* Option A (Incorrect): Trade restrictions may pressure non-compliant nations, but they do not directly improve sanctions awareness.

* Option C (Incorrect): Enforcing fines without prior education or assistance is ineffective and may create diplomatic tensions.

Best Practices for Sanctions Awareness & Compliance:

- * Develop international AML/sanctions training programs for emerging markets.
- * Encourage diplomatic engagement to strengthen legal frameworks.
- * Leverage FATF's Mutual Evaluation process to assess progress.

Reference:

FATF Recommendation 6 (Sanctions & International Cooperation)

OFAC Guidance on Sanctions Compliance for Emerging Jurisdictions

Egmont Group Guidelines on Information Sharing & Capacity Building

NEW QUESTION: 108

客戶聘請律師創立一家金融控股公司。該律師居住在歐洲。客戶向律師提供所有要求的文件。然而，律師懷疑客戶從事犯罪活動，並打算利用金融控股公司進行洗錢活動。根據歐盟反洗錢指令，反洗錢專家應建議下列哪一項？

- A. 無需提交可疑交易報告，因為此活動受到委託人客戶權限的保護。
- B. 凍結客戶的資戶，以便將所有記錄移交給主管機關。
- C. 向主管機關報告可疑活動，因為律師受到這些指示的保護。
- D. 諮詢主管機關以取得如何處理交易的建議。

Answer: (SHOW ANSWER)

The correct answer is C because the European Union Money Laundering Directives require lawyers and other independent legal professionals to report suspicious transactions to the competent authority when they are involved in certain activities on behalf of their clients, such as creating or managing companies, trusts, or other legal arrangements. The directives also provide that the obligation to report overrides any professional secrecy or confidentiality rules, except when the lawyer is ascertaining the legal position of the client or representing the client in legal proceedings or in connection with such proceedings. Therefore, the lawyer in this scenario should report the activity as suspicious to the competent authority, as creating a financial holding company for the client falls within the scope of the reporting obligation and does not qualify for the exemption¹²

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1: ACAMS Study Guide for the CAMS Certification Examination, 6th Edition, Chapter 4, page 141

2: Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, Article 33 and

34

NEW QUESTION: 109

下列哪些是金融機構在接納新企業客戶時應該檢視的風險因素？（選擇三項）

- A. 企業客戶所從事的業務類型。
- B. 新客戶所有員工的就業概況。
- C. 新客戶目前或曾經在銀行開戶的所有金融機構。
- D. 高階管理官員和所有有權操作該帳戶的個人的身分。

E. 客口所在國家或開展業務的國家或地區。

Answer: A,D,E (LEAVE A REPLY)

When onboarding a corporate customer, financial institutions must conduct due diligence to assess potential AML risks.

Option A (Correct): Understanding the nature of the business helps identify higher-risk industries (e.g., casinos, cryptocurrency exchanges, cash-intensive businesses).

Option D (Correct): Identifying senior managing officials and account signatories helps verify the true control and ownership of the company.

Option E (Correct): Jurisdictional risk assessment is key, especially if the company is from a FATF-listed high-risk country.

Why Other Options Are Incorrect:

Option B (Incorrect): The employment profiles of all employees are not relevant unless they have a direct role in financial transactions.

Option C (Incorrect): A company's banking history is not always relevant, unless there are red flags of prior financial crime involvement.

Best Practices for Corporate Customer Onboarding:

Verify beneficial ownership structures to detect potential shell companies.

Conduct enhanced due diligence (EDD) for high-risk industries and jurisdictions.

Ensure ongoing monitoring of corporate customers.

Reference:

FATF Recommendation 10 (Customer Due Diligence)

6th EU AML Directive (6AMLD) on Corporate Due Diligence

Wolfsberg Group Guidance on Corporate Customer AML Risk Management

NEW QUESTION: 110

當政府對某個目標實施經濟制裁時，其目的是

- A. 改變國家或非國家目標的行為，威脅該政府的利益或違反國際規範
- B. 利益鼓勵非政府組織增加向目標提供的人道主義和慈善援助
- C. 保護目標州公民免受其本國政府侵害的權利，並改善該地區的金融穩定
- D. 表示除非國家或非國家目標遵守政府的

Answer: A (LEAVE A REPLY)

NEW QUESTION: 111

夏季，一家機構發現了有關客口帳口活動的反洗錢問題。這位冰淇淋客口在國外銀行存入了大量支票，向不同國家發送大量高額國際電匯，每隔幾天存入數百美元現金，並為數人開出多張支票每兩周向同一批收款人支付一百美元。

哪兩種交易類型最得調？（選兩個）

- A. 定期現金存款
- B. 到國外的電匯
- C. 對同一收款人重複支票
- D. 從外國銀行開立的支票

Answer: (SHOW ANSWER)

According to the ACAMS Study Guide 6th Edition, Chapter 2, page 36, one of the methods that financial institutions can use to identify suspicious or unusual activity is to monitor transactions for red flags or indicators of money laundering or terrorist financing. Some of the common red flags are: Transactions that are inconsistent with the customer's profile, business, or source of funds Transactions that involve high-risk countries or jurisdictions, especially those with weak or inadequate anti- money laundering regulations, or those known to be sources or destinations of illicit funds Transactions that involve the use of complex or unusual financial instruments or structures, such as multiple accounts, intermediaries, or offshore entities, that have no apparent economic or lawful purpose Transactions that involve the use of large amounts of cash, checks, or monetary instruments, especially if they are structured or aggregated to avoid reporting or recordkeeping requirements Transactions that involve the use of third parties or nominees, such as relatives, associates, or shell companies, to conceal the identity, ownership, or control of the funds or assets Option B is a transaction type that warrants investigation, as it involves sending large number of high dollar international wires to different countries, which could indicate that the customer is involved in layering or integration stages of money laundering, where the illicit funds are moved across borders and disguised as legitimate transfers. This transaction type also raises the risk of exposure to sanctions, terrorist financing, or other illicit activities, depending on the destination and purpose of the wires.

Option D is also a transaction type that warrants investigation, as it involves depositing a lot of checks drawn on banks in foreign countries, which could indicate that the customer is involved in placement or layering stages of money laundering, where the illicit funds are introduced into the financial system or converted into other forms of value. This transaction type also raises the risk of exposure to fraud, counterfeit, or forgery, depending on the origin and authenticity of the checks.

Option A is not a transaction type that warrants investigation, as it involves making regular cash deposits of a few hundred dollars every few days, which could be consistent with the customer's profile, business, or source of funds, especially if the customer is an ice cream vendor who operates in cash. This transaction type does not raise any red flags of money laundering or terrorist financing, unless there is evidence that the cash deposits are structured or aggregated to avoid reporting or recordkeeping requirements.

Option C is also not a transaction type that warrants investigation, as it involves writing multiple checks for a few hundred dollars to the same dozen payees every two weeks, which could be consistent with the customer' s profile, business, or source of funds, especially if the payees are suppliers, employees, or contractors of the customer. This transaction type does not raise any red flags of money laundering or terrorist financing, unless there is evidence that the checks are used to facilitate illicit activities, such as bribery, kickbacks, or tax evasion.

ACAMS Study Guide 6th Edition, Chapter 2, page 36

Red Flags And Atypical Customer Behavior: Anti-Money Laundering Awareness

4 Red Flags of Money Laundering or Terrorist Financing

NEW QUESTION: 112

該銀行的口部金融情報部門 (FIU) 已審口與政治公眾人物 (PEP) 相關的活動；帳口中的活動包含一個大的整數，一次性電匯到一個不知名的組織 哪一項不是提交 SAR/STR 的充分理由？

- A. 受益人很大程度上未知
- B. 維護銀行聲譽
- C. 線材用量較大
- D. 客口活動不合理

Answer: (SHOW ANSWER)

The bank's reputation is not a valid criterion for filing a SAR/STR, as it is not related to the objective assessment of the suspiciousness of the transaction or the activity. The bank should file a SAR/STR based on the facts and circumstances of the case, and not on the potential impact on its image or reputation. The other options are possible indicators of money laundering or terrorist financing, and could warrant a SAR/STR filing, depending on the context and the risk profile of the customer and the transaction. For example, a large, round number wire to an obscure organization could suggest an attempt to conceal the source or destination of the funds, or to support a criminal or terrorist entity. A beneficiary that is largely unknown or has no apparent connection to the customer could indicate a lack of transparency or a false identity. A customer activity that is unreasonable or inconsistent with the customer's profile, business, or expected behavior could indicate a deviation from the normal or legitimate purpose of the account or the transaction.

CAMS Certification Package - 6th Edition, ACAMS, Chapter 5, page 123

CAMS Certifications: How to Get CAMS Certified, ACAMS

Suspicious Activity Reporting - Overview, FFIEC, page 2

3.2. Basic Structure of an STR or SAR, CBUAE Rulebook, page 1

What is a suspicious activity report?, Thomson Reuters

How to decide if SAR filing is needed, Wipfli

STR (Suspicious Transaction Reports), Ministry of Finance, India

NEW QUESTION: 113

洗錢有哪些社會/經濟後果？（選兩個）

- A. 口戰
- B. 金融機構削弱
- C. 腐敗和組織犯罪增加
- D. 口收增加
- E. 國家基礎設施的削弱

Answer: (SHOW ANSWER)

Money laundering has severe social and economic impacts, including increased crime rates, corruption and erosion of public trust. Money laundering fuels criminal activities by providing the necessary financial resources for criminals to continue their operations. As illicit funds circulate within the financial system, they enable the growth of criminal organizations and contribute to an increase in crime rates, including organized crime¹. Money laundering also facilitates corruption and undermines public trust in financial institutions and the wider economy. This erosion of public trust is exacerbated by trade-based money laundering, which involves the manipulation of international trade transactions to disguise the

origins of illicit funds². Money laundering also weakens financial institutions by exposing them to reputational, operational, legal and regulatory risks. Money launderers exploit the vulnerabilities of financial systems and compromise their integrity and stability. Money laundering can also distort the allocation of resources, create inflationary pressures, and undermine the effectiveness of monetary policy³.

1: Consequences Of Money Laundering Are: Understanding The Social, Economic, and Penalties Impacts¹

2: Consequences of Money Laundering and Financial Crime²

3: Money laundering, its impact and consequences³

Reference: <https://www.fatf-gafi.org/faq/moneylaundering/#:~:text=As%20for%20the%20potential%20negative,and%20exchange%20rates%20due%20to>

NEW QUESTION: 114

外國政治人物 (PEP) 請求在存檔保險單中新增受益人。

應如何處理請求以降低風險？

- A. 對受益人進行盡職調查
- B. 確定財富來源與資金來源
- C. 如果受益人是外國 PEP，則拒 要求
- D. 由於風險增加，拒 增加受益人的請求

Answer: (SHOW ANSWER)

According to the FATF Recommendation 12, financial institutions should take reasonable measures to determine whether the beneficiaries of a life insurance policy and/or, where required, the beneficial owner of the beneficiary are politically exposed persons. This should occur at the latest at the time of the payout¹. The purpose of this requirement is to prevent the abuse of life insurance products for money laundering or terrorist financing by PEPs or their associates. Therefore, the best way to mitigate the risk of adding a beneficiary to a life insurance policy for a foreign PEP is to perform due diligence on the beneficiary, such as verifying their identity, relationship with the PEP, and source of funds².

The other options are not correct because they either do not comply with the FATF standards, or do not adequately address the risk of adding a beneficiary to a life insurance policy for a foreign PEP.

Determining the source of wealth and source of funds is a measure that should be applied to the PEP as the customer, not the beneficiary, as part of the enhanced due diligence process². Declining the request if the beneficiary is a foreign PEP may not be feasible or proportional, as not all foreign PEPs are involved in money laundering or terrorist financing, and some may have legitimate reasons to add a beneficiary to their life insurance policy.

Declining the request to add a beneficiary due to increased risk may also not be feasible or proportional, as it may violate the contractual rights of the PEP as the customer, and may not be necessary if the due diligence on the beneficiary does not reveal any red flags or suspicions.

<https://complyadvantage.com/insights/peps-life-insurance/>

<https://www.cfatf-gafic.org/index.php/documents/fatf-40r/378-fatf-recommendation-12-politically-exposed- persons>

NEW QUESTION: 115

執法行動稱，被告在兩個月的時間內，在電子交易平台上進行了一系列銅、黃金、原油和天然氣期貨交易。一名被告多次以低價從另一方購買期貨合約，然後立即以更高的價格賣出，有效地確保了一名被告獲利而另一名被告蒙受損失，儘管這其中並不涉及任何實際的市場風險。這種類型學的名稱是什麼？

- A. 空頭部位
- B. 反向翻轉
- C. 虛假交易
- D. 買賣價差

Answer: C ([LEAVE A REPLY](#))

Wash trading is a form of market manipulation where two parties coordinate to create artificial trading activity, often for money laundering, tax fraud, or price manipulation.

Why Option C (Wash Trading) is Correct:

No real market risk is taken—transactions are simply cycled between the same parties.

Creates an illusion of liquidity or inflates asset prices artificially.

Common in commodities, stocks, cryptocurrency, and futures markets.

Red flag for money laundering: Criminals may use wash trading to layer illicit funds through financial markets.

Why Other Options Are Incorrect:

Option A (Short Position): A short position involves selling an asset one does not own and repurchasing it later at a lower price—this does not describe the described scheme.

Option B (Reverse Flip): A reverse flip is a real estate money laundering typology, not applicable here.

Option D (Bid-Ask Spread): This refers to the difference between the highest price a buyer is willing to pay and the lowest price a seller will accept, but it does not involve fraudulent trading.

AML Risks in Wash Trading:

Can be used to move illicit funds through financial markets.

Artificially increases trading volume and market price manipulation.

Frequently flagged in AML transaction monitoring systems.

Best Practices for Detecting Wash Trading:

Monitor repetitive trading between related entities.

Look for circular transactions with no economic justification.

Use AI-based transaction monitoring to detect high-frequency wash trades.

Reference:

FATF Report on Money Laundering in Capital Markets

SEC & CFTC Enforcement on Wash Trading Cases

Wolfsberg Group Market Manipulation Risk Guidelines

NEW QUESTION: 116

巴塞爾委員會的客戶盡職調查原則建議銀行在接受非面對面客戶業務時採取哪些措施來降低風險？

- A. 所提交文件的認證
- B. 需要與客戶進行面對面訪談

- C. 在規定的時間對允許的帳目活動施加限制
- D. 需要高階管理層對開戶文件進行額外審閱

Answer: (SHOW ANSWER)

Reference: <https://books.google.com.pk/books?id=gy8qBAAQBAJ&pg=PA219&lpg=PA219&dq=measure+to+mitigate+risk+does+the+Basel+Committee+C+face-to-face+customers&source=bl&ots=f52JnPYdW4&sig=ACfU3U2egwrWQj86a6eLQQ3Ew4EcR2bSVQ&hl=en&20to%20mitigate%20risk%20does%20the%20Basel%20Committee%20Customer%20Due%20Diligence%20Principles%20suggest%20banks%20apply%20when%20accepting%20business%20from%20non-face-to-face%20customers&f=false>

Reference: <https://books.google.com.pk/books?id=gy8qBAAQBAJ&pg=PA219&lpg=PA219&dq=measure+to+mitigate+risk+does+the+Basel+Committee+C+face-to-face+customers&source=bl&ots=f52JnPYdW4&sig=ACfU3U2egwrWQj86a6eLQQ3Ew4EcR2bSVQ&hl=en&20to%20mitigate%20risk%20does%20the%20Basel%20Committee%20Customer%20Due%20Diligence%20Principles%20suggest%20banks%20apply%20when%20accepting%20business%20from%20non-face-to-face%20customers&f=false>

NEW QUESTION: 117

沃爾夫斯堡集團《制止資助恐怖主義》中的哪兩項聲明定義了金融機構在反恐鬥爭中應扮演的角色？（選兩個。）

- A. 金融機構需要透過預防、偵測和資訊分享協助主管機關打擊恐怖主義融資。
- B. 金融機構需要不斷分析與恐怖主義融資相關的活動類型，並發展長期能遏止恐怖主義的模型。
- C. 金融機構應設立金融情報部門，專門調查可能發現恐怖主義融資活動的活動，以此作為減少全球恐怖主義的手段。
- D. 金融機構在發現可疑或異常活動時應進行額外的盡職調查，特別是當客戶從事被主管機關認定為用於資助恐怖主義的行業或活動時。

Answer: (SHOW ANSWER)

The correct answer is A and D, as these two statements are directly quoted from the Wolfsberg Group's "Suppression of the Financing of Terrorism" document¹. Statement A describes the general role of financial institutions in the fight against terrorism, while statement D describes the specific due diligence measures that financial institutions should apply to customers engaged in high-risk sectors or activities. Statement B and C are not part of the Wolfsberg Group's document, and they are not accurate descriptions of the role of financial institutions in the fight against terrorism. Statement B is too vague and unrealistic, as financial institutions cannot guarantee to drive down terrorism by analyzing activity types. Statement C is too narrow and prescriptive, as financial institutions may not have the resources or the mandate to create dedicated financial intelligence units for terrorist financing.

1: The Suppression of the Financing of Terrorism - Wolfsberg Statement, page 213-214.

Reference: <https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/The-Wolfsberg-Group.pdf>

NEW QUESTION: 118

下列哪一項描述了金融行動特別工作小組 (FATF) 的角色？

- A. 對金融行動特別工作小組成員國金融情報機構的監督
- B. 為反洗錢工作提供獨特的資訊交流平台
- C. 透過指令和行政命令對金融市場進行監管
- D. 透過建議和指導加強國際合作，推動反洗錢工作

Answer: (SHOW ANSWER)

* The FATF's core role is to enhance international cooperation against money laundering and terrorist financing through setting global standards ("Recommendations") and issuing guidance.

* "The FATF is an intergovernmental body whose purpose is the development and promotion of national and international policies to combat money laundering and terrorist financing."

* The FATF does not have authority to oversee FIUs, nor does it regulate financial markets directly.

References:

CAMS 6th Edition, FATF's Role and Structure

FATF Recommendations (Introduction section)

NEW QUESTION: 119

下列哪一項客戶活動構成洗錢風險最高？

- A. 轉帳資金支付飛行訓練課程費用。
- B. 按季定期向貴金屬供應商付款。
- C. 多筆現金存款略低於所需的報告限額。
- D. 在洗錢風險較高的國家/地區開展業務。

Answer: (SHOW ANSWER)

The customer activity that poses the highest risk of money laundering is making multiple cash deposits slightly below a required reporting limit. This could indicate a practice known as structuring or smurfing, which is a method of breaking down large amounts of cash into smaller transactions to avoid detection or reporting by financial institutions¹². Structuring is a common technique used by money launderers to conceal the source, ownership, or destination of illicit funds³.

The other options are not necessarily indicative of money laundering, although they may require further due diligence or monitoring depending on the customer profile and the nature of the transaction. For example:

Transferring funds to pay for flight training lessons could be a legitimate educational expense, or it could be related to terrorist financing or other criminal activities. The financial institution should verify the identity and background of the customer and the recipient, and check for any red flags or suspicious indicators⁴.

Paying a supplier of precious metals at regular quarterly intervals could be a normal business practice, or it could be a way of moving or storing value in an alternative asset class. The financial institution should assess the customer's source of funds, business rationale, and market conditions, and monitor for any changes or inconsistencies.

Conducting business in a country that represents a high risk of money laundering could be a legitimate commercial opportunity, or it could be a sign of involvement in illicit activities or tax evasion. The financial institution should apply enhanced due diligence measures, such as verifying the identity and reputation of the customer and the counterparties, obtaining information on the purpose and nature of the business relationship, and screening for any sanctions or adverse media.

ACAMS CAMS Certification Video Training Course - Exam-Labs³

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)⁴ ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 2, page 29: <https://www.acams>.

org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-2.pdf ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 6, page 121: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-6.pdf> ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 7, page 139: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-7.pdf> ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 4, page 77: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-4.pdf>

NEW QUESTION: 120

哪些可疑活動可能是透過賭場洗錢最強烈的指標？

- A. 一家私人控股公司透過賭場將資金轉入多位顧客的投注帳戶。
- B. 一位顧客經常對同一項運動賽事進行多次下注。
- C. 一位顧客在二十一點賭桌上用現金購買了大量籌碼。
- D. 顧客要求賭場將其獎金轉移給另一家賭博業者。

Answer: (SHOW ANSWER)

Casinos are high-risk for money laundering due to their cash-intensive nature and ease of moving funds anonymously.

* Option A (Correct): A private company sending funds into multiple patron accounts is suspicious because it may indicate money laundering structuring or use of mules.

* Option B (Incorrect): Betting on multiple events is normal behavior unless there is evidence of match-fixing.

* Option C (Incorrect): Large cash buy-ins are common in casinos; however, they become suspicious when coupled with other red flags (e.g., no actual gambling).

* Option D (Incorrect): Transferring winnings may be a regular transaction unless linked to structured transactions.

Reference: FATF Report on Money Laundering in Casinos (2022), FATF Recommendation 22 (DNFBPs), FinCEN Casino AML Guidance.

NEW QUESTION: 121

一家小型社區銀行的合規官被要求審閱現有的客戶入職政策和程序，以確保它們充分解決反洗錢風險。客戶盡職調查應如何實施？

- A. 每年進行合規審閱並獲得客戶批准
- B. 初次客戶入職時進行一次性活動
- C. 作為一項持續的活動，可能會根據客戶的風險狀況而變化
- D. 適用於洗錢或恐怖融資風險較高的客戶

Answer: (SHOW ANSWER)

Customer due diligence should be implemented as an ongoing activity that may vary commensurate with the risk profile of the customer. This is because the risk of money laundering or terrorist financing may change over time, depending on the customer's behavior, transactions, products, services, and geographic locations.

The institution should monitor the customer's activity and update the customer's information and risk assessment periodically, or when there are red flags or significant changes in the customer's circumstances. The institution should also apply enhanced due diligence measures for customers that pose higher risks, and simplified due diligence measures for customers that pose lower risks¹².

1:

CAMS Certification Package - 6th Edition | ACAMS, Chapter 1: Risks and Methods of Money Laundering and Terrorist Financing, p. 18-19 2: FATF Guidance: Customer Due Diligence and Financial Inclusion, February 2018, p. 10-11, <http://www.fatf-gafi.org/media/fatf/documents/reports/Guidance-CDD-and-Financial-Inclusion-2018.pdf>

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NEW QUESTION: 122

金融機構回應執法機關請求的建議方式是：

- A. 訓練所有員工，使他們能回應傳票
- B. 移交受律師委託人特權保護的文件
- C. 立即凍結已識別的帳戶
- D. 擁有審計追蹤系統來產生所需的文檔

Answer: (SHOW ANSWER)

Financial institutions are required by law to maintain records and documentation of customer transactions and to provide this information to law enforcement agencies upon request. However, financial institutions should also have policies and procedures in place to ensure that they comply with legal and regulatory requirements and protect customer privacy. Providing protected documents that are privileged under attorney-client privilege or freezing an account immediately may not be the appropriate response and may expose the financial institution to legal or reputational risks.

Reference: CAMS (6th ed.), Chapter 6, p. 261-262.

NEW QUESTION: 123

一位審計貿易融資交易的分析師注意到，相同規格和數量的商品價格在12個月內上漲了25%。分析師應該採取什麼行動？

- A. 製作一份調查報告，找到證據來證實分析師的懷疑並提交SAR/STR。
- B. 製作一份調查報告，考慮客戶活動和可能合法影響交易成本的因素。
- C. 為客戶更新盡職調查記錄，以便加強監控。
- D. 客戶描述明顯的貿易洗錢行為的 SAR/STR 並提交給金融調查部門 (FIU)。

Answer: (SHOW ANSWER)

Trade finance transactions involve the financing of the movement of goods and services across borders. Trade finance products include letters of credit, guarantees, documentary collections, open account, and supply chain finance. Trade finance transactions are exposed to various risks, such as credit risk, operational risk, fraud risk, and money laundering risk. Money laundering risk refers to the possibility that trade finance transactions are used to conceal the origin, ownership, or destination of illicit funds, or to evade taxes, sanctions, or exchange controls. Trade-based money laundering (TBML) is a form of money laundering that involves the manipulation of trade transactions, such as mispricing, misinvoicing, over- or under-shipping, or falsifying documents, to transfer value or obscure the true nature of the funds¹².

An analyst reviewing trade finance transactions should be alert to any red flags or indicators of potential TBML, such as significant discrepancies between the value or quantity of the goods and the invoice, payment, or contract; unusual or complex shipment routes or methods; involvement of high-risk jurisdictions, entities, or commodities; or lack of transparency or documentation of the trade transaction¹². If the analyst notices an increase in price of 25% over 12 months for commodities with the same specification and quantity, this could be a sign of mispricing, which is a common technique of TBML. Mispricing involves inflating or deflating the price of the goods to transfer value or evade taxes or duties. For example, an exporter may overprice the goods to move funds out of a country with exchange controls, or an importer may underprice the goods to reduce the customs duty payable¹². However, an increase in price of 25% over 12 months for commodities with the same specification and quantity does not necessarily indicate TBML, as there could be other legitimate factors that may have affected the transaction cost, such as market fluctuations, supply and demand, quality, transportation, insurance, or other fees. Therefore, the analyst should not jump to the conclusion that TBML is occurring, but rather conduct a thorough investigation to verify the validity and rationale of the price change. The analyst should produce an investigation report that considers the client activity and factors that may have legitimately affected the transaction cost, such as:

The nature and purpose of the client's business and trade activities

The client's profile, risk rating, and transaction history

The source and destination of the funds and the goods

The market price and trends of the commodities involved

The contractual terms and conditions of the trade transaction

The supporting documents, such as invoices, bills of lading, certificates of origin, inspection reports, etc.

The due diligence and verification procedures performed by the bank or the third parties
The compliance with the relevant laws, regulations, and standards of the jurisdictions involved
The investigation report should document the findings, analysis, and conclusions of the analyst, and provide evidence and references to support the assessment. The investigation report should also include any recommendations or actions to be taken by the bank or the authorities, such as:

Requesting additional information or clarification from the client or the counterparties
Conducting

enhanced due diligence or monitoring of the client or the transaction
Escalating the case to the senior management or the compliance department
Reporting the case to the Financial Investigation Unit (FIU)

or the relevant regulator Filing a Suspicious Activity Report (SAR) or a Suspicious Transaction Report (STR) if there are reasonable grounds to suspect TBML or other criminal activity Therefore, the best action for the analyst to take is to produce an investigation report that considers the client activity and factors that may have legitimately affected the transaction cost, as this would allow the analyst to determine whether the price increase is justified or indicative of TBML, and to take appropriate measures accordingly.

Trade Finance and Trade-Based Money Laundering

Trade-Based Money Laundering: Red Flag Indicators

NEW QUESTION: 124

外國資口管制辦公室域外管轄權的一個關鍵方麵包括阻止某些非美國發起的、為受限制個人或實體謀利的交易，這些交易包括透過美國或美國境口進行的交易

哪三種情況下美國銀行必須阻止交易？（選三個）

- A. 交易將發送或透過被阻止的實體
- B. 由被封鎖的個人或實體或代表被封鎖的個人或實體所發布的郵件
- C. 由被封鎖的個人和持牌實體或代表被封鎖的個人和持牌實體發起的
- D. 與被凍結的個人或實體有利益的交易有關的
- E. 與被封鎖的個人或實體沒有利益的交易有關的

Answer: ([SHOW ANSWER](#))

U).S. law requires that assets and accounts of an OFAC-specified country, entity, or individual be blocked when such property is located in the United States, is held by U.S. individuals or entities, or comes into the possession or control of U.S. individuals or entities.

For example, if a funds transfer comes from offshore and is being routed through a U.S. bank to an offshore bank, and there is an OFAC-designated party to the transaction, it must be blocked. The definition of assets and property is broad and is specifically defined within each sanction program. Assets and property includes anything of direct, indirect, present, future, or contingent value (including all types of bank transactions).

Banks must block transactions that:

- * Are by or on behalf of a blocked individual or entity;
- * Are to or go through a blocked entity; or
- * Are in connection with a transaction in which a blocked individual or entity has an interest.

NEW QUESTION: 125

會計師洗錢常用哪三種方法？（選擇三項）

- A. 代表客口法院
- B. 了解收入以承擔口務損失
- C. 誇大收入以隱藏多餘現金
- D. 充當帳口之間轉移現金的管道
- E. 扮演希望隱藏身分的人的指定人

Answer: ([SHOW ANSWER](#))

Accountants can be involved in money laundering schemes in various ways, either knowingly or unknowingly. Some of the common methods that accountants can use to launder money are:

* Overstating income to hide excess cash: This method involves inflating the revenues or profits of a business to conceal the origin of illicit funds. For example, an accountant can create fake invoices or receipts to justify the deposit of cash from illegal sources into the business account. This can make the cash appear as legitimate income from the business operations.

* Acting as a conduit for transferring cash between accounts: This method involves using the accountant's own account or a third-party account to move funds around and obscure the audit trail. For example, an accountant can receive cash from a client and deposit it into their own account, then transfer it to another account or withdraw it in a different location. This can make it difficult to trace the source and destination of the funds.

* Acting as a designee for someone who wishes to hide their identity: This method involves using the accountant's name or credentials to open accounts or conduct transactions on behalf of a client who wants to remain anonymous. For example, an accountant can act as a nominee director or shareholder for a shell company that is used to launder money. This can make it appear as if the accountant is the owner or beneficiary of the funds, while the actual owner or beneficiary is hidden.

Money Laundering: What It Is and How to Prevent It - Investopedia, The Process of Laundering Money Revealed: accountants aiding money laundering - Accountancy Age, Accountants' methods
Accountants in the anti-money laundering front line, Accountants' obligations
<https://www.ojp.gov/pdffiles1/Digitization/119840NCJRS.pdf>

NEW QUESTION: 126

客戶經營農產品出口業務。多年來，對加勒比地區的銷售一直穩定成長。該客戶的帳戶餘額在上個月突然增加。

反洗錢專家應根據什麼理由準備可疑交易報告？

- A. 活動增加是由於匯票存款所致。
- B. 電匯來自金融行動特別工作小組成員國。
- C. 客戶在未告知機構的情況下更改了地址。
- D. 購買旅行支票（支票）用於前往非合作國家和地區的旅行

Answer: (SHOW ANSWER)

The customer activity that should trigger a suspicious transaction report is purchasing travelers checks (cheques) for trips to a Non-Cooperative Countries and Territories (NCCTs). This could indicate an attempt to evade currency reporting requirements, avoid sanctions or embargoes, or facilitate money laundering or terrorist financing through high-risk jurisdictions¹². NCCTs are countries or territories that have been identified by the Financial Action Task Force (FATF) as having serious deficiencies in their anti-money laundering and counter-terrorist financing regimes, and that pose a threat to the international financial system³.

The other options are not necessarily grounds for a suspicious transaction report, although they may require further due diligence or monitoring depending on the customer profile and the nature of the transaction. For example:

* The increased activity is due to money order deposits. This could be a legitimate source of income for the customer's export business, or it could be a way of disguising the origin or destination of the funds. The anti-money laundering specialist should verify the identity and background of the customer and the issuers of the money orders, and check for any red flags or suspicious indicators⁴.

* Wire transfers are coming from a Financial Action Task Force member country. This could be a normal business practice, or it could be a sign of involvement in trade-based money laundering or other illicit activities. The anti-money laundering specialist should assess the customer's source of funds, business rationale, and market conditions, and monitor for any changes or inconsistencies.

* The client changed his address without advising the institution. This could be a simple oversight, or it could be a way of concealing the customer's true location or identity. The anti-money laundering specialist should update the customer's information, verify the new address, and check for any adverse media or sanctions.

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Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)⁴ ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 1, page 11: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-1.pdf>

ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 2, page 29: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-2.pdf>

ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 4, page 77: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-4.pdf>

ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 5, page 97: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-5.pdf>

NEW QUESTION: 127

哪些情況可以繞過強化盡職調查 (EDD)？

- A. 在完全符合集團政策和程序的高風險第三國設立歐盟或美國金融機構的分支機構或控股子公司。
- B. 在高風險國家/地區設立子公司，該國家地區擁有歐盟或美國長期且信譽良好的客戶的複雜所有權結構。
- C. 入駐總部位於歐盟或美國的賭場，該賭場是國際連鎖飯店的一部分，提供的總收入不到50%，並且完全符合集團範圍內的政策和程序。
- D. 將一位來自歐盟的知名政治人物 (PEP) 加入美國金融機構 (FI) 的財富管理部門。

Answer: (SHOW ANSWER)

Enhanced due diligence (EDD) is a set of additional measures that must be applied by financial institutions (FIs) in higher-risk situations, such as when dealing with customers or transactions from high-risk third countries, customers who are politically exposed persons (PEPs), or customers who present a higher risk of money laundering or terrorist financing. EDD may include obtaining more information on the customer's identity, source of funds, source of wealth, business relationships, and purpose of the transaction, as well as conducting more frequent and intensive ongoing monitoring of the customer's activities.

However, EDD may be bypassed for certain situations where the risk of money laundering or terrorist financing is low, and where the customer is subject to adequate supervision and regulation in the EU or

the US. According to the CAMS Study Guide - 6th Edition¹, one such situation is when on-boarding a casino that is part of an international hotel chain, provides less than 50% of overall revenue and that fully complies with group-wide policies and procedures. This is because such a casino is likely to have a low risk profile, as it is not the main source of income for the hotel chain, and it adheres to the same standards and controls as the rest of the group. Therefore, EDD may not be necessary for this situation, and the FI may apply simplified due diligence (SDD) instead.

The other situations listed in the question are not eligible for bypassing EDD, as they involve higher-risk factors, such as dealing with customers or entities from high-risk third countries, customers with complex ownership structures, or customers who are PEPs. These situations require FIs to apply EDD measures to mitigate the risk of money laundering or terrorist financing.

CAMS Study Guide - 6th Edition, Chapter 3, Section 3.4, page 84

White Paper on KYC - Enhanced Due-Diligence, page 2

Anti-money laundering - a guide to customer due diligence, page 3

Enhanced Due Diligence for High-risk Customers, page 1

NEW QUESTION: 128

當現有客戶成為政治公眾人物 (PEP) 時, KYC 分析師在審核/刷新期間應該做什麼?

- A. 在將授權簽字人標記為 PEP 之前, 請徵求合規官員的建議
- B. 更新客戶資料中的新授權簽字人。
- C. 為客戶執行強化盡職調查並更新 KYC 資料。
- D. 更新簽署者清單並在下一個定期刷新週期中執行增強的盡職調查。

Answer: (SHOW ANSWER)

When an existing customer becomes a politically exposed person (PEP), the KYC analyst should perform enhanced due diligence (EDD) for that customer. EDD involves gathering additional information about the customer, assessing the risk associated with their PEP status, and updating the KYC profile accordingly. The goal is to ensure compliance with regulations, verify customer identities, and mitigate the higher risk posed by PEPs. Regular monitoring and updates during the review/refresh period are essential to stay informed about any changes in the customer's status or risk profile¹.

References:

PEP in KYC & KYB: Requirements and Steps for PEP Screening

Politically Exposed Persons (PEP): Definition and Risks | Okta

How to effectively screen PEPs to meet KYC requirements - Castellum.AI

NEW QUESTION: 129

守門人, 包括會計師, 可以很好地識別和發現工作類型或客戶活動性質的變化

為了做到這一點, 他們需要了解與以下相關的風險: (選擇兩個)

- A. 會計客戶的經驗。
- B. 企業實體客戶。
- C. 所要求服務的主題。
- D. 短期客戶關係。

Answer: (SHOW ANSWER)

Gatekeepers (e.g., accountants, auditors, lawyers) play a critical role in detecting financial crime.

* Option B (Correct): Corporate clients pose higher money laundering risks due to complex ownership structures and cross-border financial activities.

* Option C (Correct): The nature of requested services (e.g., offshore structuring, large cash transactions) can indicate potential money laundering attempts.

Why Other Options Are Incorrect:

* Option A (Incorrect): The length of time a client has been with an accounting firm does not necessarily indicate financial crime risk.

* Option D (Incorrect): Short-term relationships may be high-risk, but understanding the business type and services requested is more critical.

Red Flags for Money Laundering in Professional Services:

* Clients requesting offshore structures for no apparent business reason.

* Use of complex trusts or nominee directors to obscure ownership.

* Unexplained large transactions moving through legal or accounting firms.

Best Practices for Gatekeepers to Prevent Money Laundering:

* Perform Enhanced Due Diligence (EDD) on high-risk clients.

* Report unusual financial activity to FIUs.

* Follow FATF's DNFBP (Designated Non-Financial Businesses and Professions) AML guidelines.

Reference:

FATF Recommendation 22 (AML Compliance for Accountants and Lawyers)

Wolfsberg Group Guidance on DNFBP AML Risks

EU 6th AML Directive (6AMLD) on DNFBP Risk Management

Final Thoughts:

FIUs play a central role in financial intelligence collection and sharing.

The Egmont Group enables cross-border AML cooperation among FIUs.

Gatekeepers, such as accountants and lawyers, must monitor corporate clients for money laundering risks.

NEW QUESTION: 130

金融行動特別工作小組 40 項建議針對實益所有權的透明度提出了哪些建議？

A. 看門人

B. 代理銀行

C. 透過帳口支付

D. 法人與安排

Answer: (SHOW ANSWER)

The Financial Action Task Force (FATF) 40 Recommendations address the transparency and beneficial ownership of legal persons (such as companies, foundations, associations, etc.) and legal arrangements (such as trusts, fiducies, anstalts, etc.) in Recommendations 24 and 25. These recommendations aim to prevent the misuse of legal persons and arrangements for money laundering, terrorist financing and other illicit purposes, by requiring countries to ensure that accurate and up-to-

date information on the natural persons who ultimately own or control them (the beneficial owners) is available to the competent authorities in a timely manner.

CAMS Study Guide - 6th Edition, Chapter 4, page 112

CAMS Certification Exam Outline, Domain 1, Task 1.2, Skill 1.2.2

Guidance on Transparency and Beneficial Ownership, FATF, October 2014

Recommendation 24: Transparency and beneficial ownership of legal persons, FATF

[Recommendation 25: Transparency and beneficial ownership of legal arrangements], FATF

Reference:<https://www.fatf-gafi.org/documents/news/transparency-and-beneficial-ownership.html>

NEW QUESTION: 131

從歷史上看，哪種工具最常用於隱藏受益所有權？

- A. 專業協會
- B. 離岸公司
- C. 有限責任合夥企業
- D. 慈善組織

Answer: B (LEAVE A REPLY)

a vehicle that is historically most often used to hide beneficial ownership, which is an offshore company. An offshore company is a legal entity that is incorporated or registered in a foreign jurisdiction, usually with low or no taxes, high confidentiality, and lax regulation. Offshore companies can be used by money launderers and other criminals to conceal the true identity and ownership of the funds or assets that they control, and to evade taxes, reporting, or legal obligations in their home jurisdictions. Offshore companies can also be layered with other vehicles, such as trusts, foundations, or nominees, to create complex and opaque structures that make it difficult for authorities to trace the source and destination of illicit funds.

The other options are not necessarily vehicles that are most often used to hide beneficial ownership, although they may pose some risks or challenges depending on the circumstances and the risk profile of the customers and countries involved. Option A describes a professional association, which is a group of individuals or entities that share a common profession or interest, such as lawyers, accountants, or doctors. Professional associations may be involved in money laundering or terrorist financing as facilitators, intermediaries, or advisors, but they are not typically used to hide beneficial ownership. Option C describes a limited liability partnership, which is a legal entity that combines the features of a partnership and a corporation, and limits the liability of its partners. Limited liability partnerships may be used by money launderers or terrorist financiers to obscure the ownership or control of funds or assets, but they are not as common or as secretive as offshore companies. Option D describes a charitable organization, which is a non-profit entity that is established for a charitable, religious, educational, or other public benefit purpose. Charitable organizations may be abused by money launderers or terrorist financiers to divert funds or assets for illicit purposes, but they are not usually used to hide beneficial ownership.

ACAMS CAMS Certification Video Training Course - 6th Edition1

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)2 ACAMS CAMS Study Guide - 6th Edition, Chapter 4, pages 86-87

<https://www.acams.org/wp-content/uploads/2019/09/ACAMS-CAMS-Study-Guide-6th-Edition-Chapter-4.pdf>

NEW QUESTION: 132

一家信貸機構收到初步調口結果報告，報告強調該機構在該國存在嚴重違反反洗錢義務的情況，並指出其面臨被撤銷銀行執照的可能性。

哪些部門可以發布該報告？

- A. 銀行業自律機構
- B. 執法機關
- C. 金融行動特別工作小組 (FATF)
- D. 反洗錢監理機構

Answer: (SHOW ANSWER)

The AML supervisory authority is responsible for overseeing financial institutions' compliance with AML/CFT regulations.

* Option D (Correct): AML supervisory authorities, such as the Financial Conduct Authority (FCA) in the UK, FinCEN in the US, or European Central Bank (ECB) for EU institutions, conduct inspections, issue reports, and enforce penalties when AML deficiencies are found.

* Option A (Incorrect): Self-regulatory bodies provide guidelines but do not have legal authority to withdraw banking licenses.

* Option B (Incorrect): Law enforcement may investigate criminal conduct, but regulatory compliance issues fall under AML supervisory authorities.

* Option C (Incorrect): FATF provides guidance and assessments but does not directly enforce compliance at individual financial institutions.

Reference: FATF Recommendation 26 (Regulation and Supervision of Financial Institutions), EU AMLD Directives, FinCEN, FCA Regulatory Guidance.

NEW QUESTION: 133

金融行動特別工作組 (FATF) 建議對存在戰略缺陷的司法管轄區採取哪些行動？

- A. 進行盡職調口
- B. 採取對策
- C. 將管轄區加入聯合國制裁的管轄區清單中
- D. 在沒有 FATF 支援的情況下制定行動計畫來解決缺陷

Answer: (SHOW ANSWER)

Reference: <http://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/publicstatement-october-2018.html>

"Countries can be subject to comprehensive or targeted sanctions. Comprehensive sanctions prohibit virtually all transactions with a specific country. Targeted sanctions prohibit transactions with specified industries, entities or individuals listed on OFAC's Specially Designated Nationals and Blocked Parties List. Failure to comply may result in criminal and civil penalties. FATF also maintains a list of jurisdictions identified as high-risk and noncooperative, whose AML/CFT regimes have strategic deficiencies and are not at international standards. As a result, FATF calls on its members to implement

COUNTERMEASURES against the jurisdiction, such as financial institutions applying enhanced due diligence to business relationships and transactions with natural and legal persons from the identified jurisdiction in an attempt to persuade the jurisdiction to improve its AML/CFT regime."

NEW QUESTION: 134

根據沃爾夫斯堡代理銀行反洗錢原則，哪兩個因素會增加代理銀行客戶的風險並需要額外的盡職調查？
(選兩個)

- A. 客戶位於金融行動特別工作小組成員國，主要向當地個人客戶提供服務
- B. 客戶位於金融行動特別工作小組成員國，且銀行資訊安全負責人是政治人物
- C. 客戶位於金融行動特別工作小組成員國，並向鄰國的其他代理銀行提供服務
- D. 客戶位於非金融行動特別工作小組成員國，主要為從事國際貿易的商業客戶提供服務

Answer: (SHOW ANSWER)

According to the Wolfsberg Anti-Money Laundering Principles for Correspondent Banking, the risk of a correspondent bank customer depends on various factors, such as the nature of the customer's business, the customer's location, the products and services offered, the customer's ownership and management structure, and the customer's customer base¹. Among these factors, two that should increase the risk and require additional due diligence are:

* The customer is located in a Financial Action Task Force (FATF) member country and the bank's head of information security is a politically exposed person (PEP). A PEP is an individual who is or has been entrusted with a prominent public function, such as a senior government official, a judicial or military officer, a senior executive of a state-owned corporation, or a political party leader². PEPs pose a higher risk of money laundering, corruption, or bribery due to their influence and access to public funds³. Therefore, a correspondent bank customer that has a PEP in a key position should be subject to enhanced due diligence, such as verifying the source of funds, the purpose of the relationship, and the PEP's reputation and integrity⁴.

* The customer is located in a non-FATF member country and services mostly commercial customers who engage in international trade. A non-FATF member country is a country that is not part of the FATF, an inter-governmental body that sets standards and promotes effective implementation of legal, regulatory, and operational measures for combating money laundering, terrorist financing, and other related threats to the integrity of the international financial system⁵. Non-FATF member countries may have weaker or less consistent anti-money laundering and counter-terrorist financing regimes, and may pose a higher risk of financial crime or sanctions evasion⁶. Moreover, a correspondent bank customer that services mostly commercial customers who engage in international trade may be exposed to trade-based money laundering, which is the process of disguising the proceeds of crime and moving value through the use of trade transactions⁷. Therefore, a correspondent bank customer that operates in a non-FATF member country and deals with international trade should be subject to enhanced due diligence, such as obtaining information on the nature and volume of the trade transactions, the origin and destination of the goods, and the identity and reputation of the trade counterparties⁸.

The other options are not correct because they do not necessarily increase the risk of a correspondent bank customer or require additional due diligence. A customer that is located in a FATF member country and provides services primarily to a local individual customer may pose a lower risk of money

laundering or terrorist financing, as the customer's activities are subject to the FATF standards and recommendations, and the customer's customer base is less likely to involve complex or cross-border transactions. A customer that is located in a FATF member country and provides services to other correspondent banks in neighboring countries may also pose a lower risk of money laundering or terrorist financing, as the customer's activities are subject to the FATF standards and recommendations, and the customer's customer base is composed of regulated financial institutions that are subject to their own anti-money laundering and counter-terrorist financing obligations.

answer: BD

According to the Wolfsberg Anti-Money Laundering Principles for Correspondent Banking, the risk of a correspondent bank customer depends on various factors, such as the nature of the customer's business, the customer's location, the products and services offered, the customer's ownership and management structure, and the customer's customer base¹. Among these factors, two that should increase the risk and require additional due diligence are:

* The customer is located in a Financial Action Task Force (FATF) member country and the bank's head of information security is a politically exposed person (PEP). A PEP is an individual who is or has been entrusted with a prominent public function, such as a senior government official, a judicial or military officer, a senior executive of a state-owned corporation, or a political party leader². PEPs pose a higher risk of money laundering, corruption, or bribery due to their influence and access to public funds³. Therefore, a correspondent bank customer that has a PEP in a key position should be subject to enhanced due diligence, such as verifying the source of funds, the purpose of the relationship, and the PEP's reputation and integrity⁴.

* The customer is located in a non-FATF member country and services mostly commercial customers who engage in international trade. A non-FATF member country is a country that is not part of the FATF, an inter-governmental body that sets standards and promotes effective implementation of legal, regulatory, and operational measures for combating money laundering, terrorist financing, and other related threats to the integrity of the international financial system⁵. Non-FATF member countries may have weaker or less consistent anti-money laundering and counter-terrorist financing regimes, and may pose a higher risk of financial crime or sanctions evasion⁶. Moreover, a correspondent bank customer that services mostly commercial customers who engage in international trade may be exposed to trade-based money laundering, which is the process of disguising the proceeds of crime and moving value through the use of trade transactions⁷. Therefore, a correspondent bank customer that operates in a non-FATF member country and deals with international trade should be subject to enhanced due diligence, such as obtaining information on the nature and volume of the trade transactions, the origin and destination of the goods, and the identity and reputation of the trade counterparties⁸.

NEW QUESTION: 135

合規分析師正在審閱客戶的帳目活動，他們懷疑該帳目活動可能表明存在洗錢活動。僅根據客戶的帳目活動和 KYC 文件很難確定哪一個？

- A. 如果活動與相關業務有重大差異
- B. 如果帳目多次向同一相關企業進行轉帳
- C. 是否有與交易對手相關的負面媒體

D. 如果帳口大部分處於休眠狀態或幾乎沒有活動

Answer: (SHOW ANSWER)

According to the Certified Anti-Money Laundering Specialist (CAMS) study guide, 6th edition, page 105, the correct answer is C. It can be difficult to determine if there is negative media associated with counterparties solely from the customer's account activity and KYC file.

The study guide explains that negative media can include news articles, government sanctions lists, and other sources of public information that may indicate that a counterparty is involved in illicit activities. However, this information may not be readily available in a customer's account activity or KYC file, and may require additional research or investigation.

NEW QUESTION: 136

巴塞爾銀行監理委員會所確定的 KYC 計畫的基本要素有哪些？

(選兩個)

- A. 口部控制
- B. 客口接受政策
- C. 行為準則
- D. 風險管理
- E. 風險偏好

Answer: (SHOW ANSWER)

According to the Basel Committee on Banking Supervision (BCBS), a sound KYC program should consist of four essential elements: (i) customer acceptance policy; (ii) customer identification; (iii) on-going monitoring of higher risk accounts; and (iv) risk management. Therefore, B and D are the correct choices among the given options. A customer acceptance policy defines the types of customers that the bank is willing to accept and the conditions for doing so. A risk management system ensures that the bank has adequate policies, procedures, and controls to identify, measure, monitor, and mitigate the risks arising from its KYC program.

References:

BCBS, Customer due diligence for banks, October 2001, p. 41

BCBS, Consolidated KYC Risk Management, October 2004, p. 42

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NEW QUESTION: 137

哪個金融情報機構 (FIU) 集體機構成立的目的是為了改善 FIU 成員之間的資訊交換和共享機制，並透過提高其能力來支持其成員？

- A. 沃爾夫斯堡集團
- B. 國際貨幣基金組織 (IMF)
- C. 經濟合作及發展組織 (OECD)
- D. 埃格蒙特集團

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 138

在什麼情況下，洗錢活動會因洗錢者投資髒資金而對一國貨幣和利率產生不利影響？

- A. 他們投資於高報酬率的高風險企業
- B. 他們投資合法公司，以此讓他們的資金看起來合法
- C. 他們投資於秘密避風港的空殼公司，故意操縱利率
- D. 他們以隱藏資金的方式進行投資，而不是獲得高回報率

Answer: ([SHOW ANSWER](#))

Money laundering can have negative effects on a country's currencies and interest rates, as it distorts the allocation of resources and the demand and supply of money. According to the IMF¹, money laundering can also adversely affect currencies and interest rates as launderers reinvest funds where their schemes are less likely to be detected, rather than where rates of return are higher. This can create artificial fluctuations and imbalances in the exchange and interest rates, and undermine the effectiveness of monetary policy. For example, if launderers invest in low-yield assets such as government bonds or real estate, they may drive up the prices and lower the yields of these assets, while reducing the availability of funds for more productive investments. This can also affect the inflation and growth prospects of the country.

1: Macroeconomic Implications of Money Laundering by Peter J. Quirk, IMF Working Paper, 1996

2: Understanding Money Laundering: How It Impacts the Global Economy by Tookitaki, 2019

3: Money Laundering by U.S. Department of the Treasury, 2021

4: The Consequences of Money Laundering and Financial Crime by John McDowell and Gary Novis, U.S.

Department of State, 2001

NEW QUESTION: 139

對於提供客戶線上服務的金融機構來說，下列哪項洗錢風險最大？

- A. 將客戶與所提供的身份證明文件進行配對存在較大困難。
- B. 沒有人審查客戶的交易，從而增加了大額交易的可能性。
- C. 提供線上服務的機構無法正確驗證其客戶的身分。
- D. 客戶可以直接存取其帳戶而不被偵測到。

Answer: ([SHOW ANSWER](#))

According to the Anti-Money Laundering Specialist (the 6th edition) study guide, one of the main challenges of providing on-line services to customers is the verification of their identity and the

authentication of their transactions¹. The lack of face-to-face contact and the use of electronic documents increase the risk of identity fraud, impersonation, and account takeover². Therefore, financial institutions offering on-line services need to implement robust customer due diligence (CDD) measures, such as using multiple sources of information, verifying biometric data, and applying risk-based monitoring³.

1: CAMS Study Guide, 6th Edition, Chapter 4, Section 4.1, page 103

2: CAMS Study Guide, 6th Edition, Chapter 4, Section 4.2, page 104

3: CAMS Study Guide, 6th Edition, Chapter 4, Section 4.3, page 105

NEW QUESTION: 140

提供服務的信託和公司服務提供者 (TCSP) 應制定適當的政策和程序來識別以下方面的關鍵資訊：

- A. 總經理。
- B. 簽字人。
- C. 控制器。
- D. 註冊地址。

Answer: (SHOW ANSWER)

A TCSP providing services should have policies and procedures in place to identify critical information of the signatory, as this is one of the key elements of the customer due diligence (CDD) process. The signatory is the person who has the authority to sign documents or contracts on behalf of the customer, such as a company, a trust, or a partnership. The signatory may also be the beneficial owner, the controller, or a nominee of the customer. The TCSP should verify the identity and the capacity of the signatory, as well as the source and origin of the funds or assets involved in the transaction or business relationship. The TCSP should also monitor the activities of the signatory and report any suspicious or unusual transactions or changes in the signatory's behaviour or profile.

ACAMS Study Guide for the CAMS Certification Examination - 6th Edition, Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Section 2.2:

Customer Due Diligence (CDD), Subsection 2.2.1: CDD Process, pp. 51-52

RISK-BASED APPROACH GUIDANCE FOR TRUST AND COMPANY SERVICE PROVIDERS

(TCSPs), Section III - Guidance for TCSPs, Subsection III.1: Risk Assessment, pp. 23-24 SRA | Trust and Company Service Provider guidance | Solicitors Regulation Authority, Section: Definition, Paragraph 2 A Trust and Company Service Provider (TCSP) providing services should have policies and procedures in place to identify critical information of the:, Answer B

NEW QUESTION: 141

在審口貨幣服務企業 (MSB) 的業務運作時，下列哪些活動被視為洗錢危險訊號？（選兩個）

- A. 客口將來自高風險管轄區的外幣兌換為報告門檻以下的本國貨幣。
- B. 現金密集型企業，例如便利商店或餐館，需要大量現金存款
- C. 客口經常向其祖國進行小額國際匯款。
- D. 客口在進行國際電匯時不願提供受益人姓名或地址資訊。

E. 客戶使用多個不同名稱的帳戶進行交易。

Answer: D,E (LEAVE A REPLY)

MSBs are high-risk for financial crime, requiring strict AML controls.

* Option D (Correct): Hesitancy to provide beneficiary information is a strong indicator of illicit financial activity.

* Option E (Correct): Using multiple accounts under different names is a known money laundering technique.

* Option A (Incorrect): Currency exchange is common in MSBs, though additional factors must be assessed.

* Option B (Incorrect): Large cash deposits are normal for cash-based businesses, but need further scrutiny.

* Option C (Incorrect): Frequent small remittances are normal, unless linked to structuring or smurfing.
Reference: FATF Red Flags for MSBs, Wolfsberg Group MSB Risk-Based Approach, FinCEN Money Services Business AML Guidelines.

NEW QUESTION: 142

根據金融行動特別工作小組 40 項建議，各國應針對資助恐怖主義行為採取哪些行動？

- A. 反對
- B. 制裁
- C. 起訴
- D. 定罪

Answer: (SHOW ANSWER)

The FATF 40 Recommendations are the international standards for combating money laundering, terrorist financing, and proliferation financing. They provide a comprehensive and consistent framework of measures that countries should implement in their national systems. Recommendation 5 of the FATF 40 Recommendations states that countries should criminalize the financing of terrorism, terrorist acts and terrorist organizations. This means that countries should adopt laws that make it an offence to provide or collect funds or other assets with the intention or knowledge that they will be used to carry out terrorist acts or support terrorist organizations. Countries should also ensure that such offences are punishable by effective, proportionate and dissuasive sanctions. Furthermore, countries should ensure that terrorist financing offences extend to any person who wilfully provides or collects funds or other assets by any means, directly or indirectly, with the unlawful intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out terrorist acts or support terrorist organizations. Therefore, the correct answer is D. Criminalize, as this is the action that countries should take related to the financing of terrorist acts in accordance with the FATF 40 Recommendations.

FATF website

FATF 40 Recommendations - February 2012

FATF Recommendation 5 - Criminalisation of Terrorist Financing

Reference: <https://www.fatf-gafi.org/publications/methodsandtrends/documents/fatf-action-against-terroristfinancing-feb-2019.html>

NEW QUESTION: 143

一位反洗錢專家擔心，幾份可疑交易報告將討論銀行員工潛在的非法活動。在這種情況下，下列哪一項是該機構目前最關心的問題？

- A. 禁止向委員會分發可疑交易報告副本。
- B. 向主管機關提交可疑交易報告的時間。
- C. 向董事會報告時所使用的表格類型。
- D. 確保及時通知董事會。

Answer: (SHOW ANSWER)

According to the BSA/AML Manual¹, a financial institution's board of directors and senior management are ultimately responsible for ensuring that the institution has a comprehensive and effective BSA/AML compliance program and oversight framework. This includes ensuring that the institution timely identifies, reports, and responds to suspicious activity involving its products, services, customers, or employees.

Therefore, when an anti-money laundering specialist is concerned that several suspicious transaction reports will discuss potential illegal activity of bank employees, the immediate concern for the institution is to ensure no delay in informing the board of directors and senior management of the situation, as well as the actions taken or planned to address the risks and mitigate the potential harm. The board and senior management should be kept informed of the status and outcome of any internal or external investigations, as well as any regulatory or law enforcement inquiries or actions, related to the suspicious activity involving bank employees.

BSA/AML Manual¹

Suspicious Activity Reporting - Overview²

Suspicious Activity Report (SAR) Basics³

What's Suspicious? Here's How Banks Apply the Smell Test⁴

NEW QUESTION: 144

在審閱貨幣服務企業 (MSB) 的業務運作時，哪些活動會被視為洗錢危險訊號？（選兩個）

- A. 客戶在進行國際電匯時不願提供收款人姓名或地址資訊
- B. 現金密集型企業，例如便利商店或餐館，進行大量現金存款
- C. 客戶將來自高風險管轄區的外幣兌換為報告門檻以下的本國貨幣
- D. 客戶使用不同名稱的多個帳戶進行交易
- E. 一位客戶頻繁地向其祖國進行小額國際匯款

Answer: (SHOW ANSWER)

When reviewing business operations of a Money Services Business (MSB), it is critical to identify behaviors that indicate potential money laundering activity. The CAMS Study Guide - 6th Edition outlines several red flags commonly associated with MSBs.

Option A is correct:

A customer being hesitant to provide beneficiary information, such as the name or address, is a red flag. It may indicate attempts to hide the true purpose or recipient of the funds and could suggest structuring or layering activity.

Option Dis correct:

A customer using multiple accounts under different names to conduct transactions is a strong red flag. This could indicate efforts to obscure ownership, avoid detection, or conduct suspicious structuring behavior to stay below reporting thresholds.

Option Bis incorrect:

While large cash deposits from cash-intensive businesses may require further review, they are not inherently suspicious unless inconsistent with the nature of the business or transaction volume.

Option Cis incorrect:

Currency exchanges under the reporting threshold, even from high-risk jurisdictions, are not in themselves red flags unless they show a pattern of structuring or are part of larger suspicious behavior.

Option Eis incorrect:

Frequent small-dollar transfers to a native country may be normal remittance behavior and only become suspicious if tied to additional indicators such as structuring or third-party involvement.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Recognizing and Reporting Suspicious Activity- Section: Red Flags for Money Services Businesses

NEW QUESTION: 145

金融機構如何驗證企業的性質、目的及其合法性？

- A. 透過審閱公司最新審計報告和帳目的副本
- B. 透過進行公司調閱或其他商業調閱，以了解該機構尚未或不在解散或終止的過程中
- C. 透過查看公司網站
- D. 透過使用獨立的資訊驗證流程，例如透過存取公共和私人資料庫

Answer: D (LEAVE A REPLY)

A financial institution can verify the nature and purpose of a business and its legitimacy by using an independent information verification process, such as by accessing public and private databases. This method can help the financial institution to check the names of businesses against anti-money laundering (AML) watchlists, parse and analyze ownership information to determine beneficial ownership structure, and run the beneficial owners themselves through identity verification and AML watchlist checks¹. This can also help the financial institution to comply with the regulatory requirements for customer due diligence (CDD), which include obtaining and analyzing sufficient customer information to understand the nature and purpose of customer relationships for the purpose of developing a customer risk profile². Other methods, such as reviewing a copy of the corporation's latest audited reports and accounts, undertaking a company search or other commercial inquiries, or reviewing the company's website, may not provide sufficient or reliable information to verify the nature and purpose of a business and its legitimacy.

Customer due diligence for banks by the Basel Committee on Banking Supervision, October 2001.
How to Verify Legitimate Businesses and Merchants by Trulioo, March 2021.

NEW QUESTION: 146

洗錢會口生社會和經濟影響，尤其是在發展中國家。一個國家洗錢活動數量高可能：（選兩個）

- A. 降低對該國金融部門的信心。
- B. 勸阻政府口收獎勵計畫。
- C. 降低就業率。
- D. 阻止外國投資。
- E. 降低匯率和利率的波動。

Answer: (SHOW ANSWER)

Money laundering negatively affects economic stability by discouraging investment, distorting markets, and eroding public trust.

* Option A (Correct): A financial system tainted by money laundering loses credibility, leading to reduced investor and consumer confidence.

* Option D (Correct): Foreign investors avoid jurisdictions with weak AML controls due to the risk of sanctions and reputational damage.

* Option B (Incorrect): While tax evasion is linked to money laundering, it does not directly affect the decision to implement tax incentives.

* Option C (Incorrect): Unemployment may result from economic instability, but money laundering does not directly cause job losses.

* Option E (Incorrect): Money laundering often increases volatility in financial markets, not reduces it.

Reference: FATF Report on the Consequences of Money Laundering (2011); World Bank Report on Financial Integrity (2020).

NEW QUESTION: 147

在有關潛在洗錢的執法調口訪談中，嫌疑人開始做出調口人員認為錯誤的斷言和陳述。調口人員該如何應對？

- A. 告知嫌疑人明顯有欺騙行為並繼續採訪
- B. 告知嫌疑人，如果有欺騙嫌疑，訪談將被終止
- C. 將訪談引向另一個方向，直到雙方關係更加融洽，然後再回到令人不安的問題
- D. 就涉嫌不實陳述提出實質問題，但不透露涉嫌欺騙行為

Answer: (SHOW ANSWER)

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.

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: 148

一名學校老師最近在一家主要銀行開設了私人銀行帳戶。該客戶表示年收入為 45,000 歐元，並將她的財富來源列為從親戚那裡繼承的 150 萬歐元。客戶計劃投資每年從不記名債券賺取的 12,000 至 15,000 歐元。客戶經理在開口前驗證了客戶的身份並將所有上述資訊記錄在帳戶文件中。在對帳戶進行例行審計期間，鑽石經銷商進行了多次電子轉賬，每次轉帳金額超過 500 萬歐元。客戶經理也注意到，每次客戶都會立即將資金轉入香港的銀行帳戶。下列哪一項適合反洗錢專家推薦？

- A. 安排客戶和法律部門之間的會議。
- B. 聯絡主管機關和地方執法單位。
- C. 暫停透過銀行進行的進一步客戶交易。
- D. 調查交易的來源和目的。

Answer: (SHOW ANSWER)

The customer's profile and transactions are highly suspicious and indicative of possible money laundering.

The customer's income, source of wealth, and investment plans do not match with the large and frequent transfers from a diamond distributor, which is a high-risk business sector for money laundering. The customer's transfers to Hong Kong, which is a high-risk jurisdiction for money laundering, also raise red flags. The anti-money laundering specialist should recommend contacting the competent authority and local law enforcement to report the suspicious activity and cooperate with any investigation. This is in accordance with the FATF Recommendation 20, which states that "If a financial institution suspects or has reasonable grounds to suspect that funds are the proceeds of a criminal activity, or are related to terrorist financing, it should be required, by law, to report promptly its suspicions to the financial intelligence unit (FIU)"¹. The other options are not appropriate, as they do not address the urgency and severity of the situation.

1: FATF (2012), International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation, FATF, Paris, France, www.fatf-gafi.org/recommendations.html, p. 19.

NEW QUESTION: 149

根據金融行動特別工作小組的規定，應要求金融機構實施：

- A. 與附屬機構和分支機構交換資訊的加密特殊程序。
- B. 獨立的 AML 計劃，以確保隱私和保護機密資訊。
- C. 指定高級官員的流程，確保出於反洗錢和恐怖主義融資目的安全交換資訊。
- D. 集團範圍內的計劃，包括有關反洗錢合規性的政策和程序。

Answer: (SHOW ANSWER)

According to the web sources I found, FATF Recommendation 18 requires financial institutions to implement group-wide programmes against money laundering and terrorist financing that include policies and procedures for sharing information within the group for AML/CFT purposes¹². These programmes should also include compliance management arrangements, screening procedures for hiring employees, an independent audit function and ongoing employee training¹.

NEW QUESTION: 150

正常的開戶程序顯示，聯繫金融機構開設銀行帳戶的客戶是外國司法機構一位知名人士的兄弟。反洗錢專家應立即建議採取下列哪些行動？

- A. 監控客戶的帳戶。
- B. 加強盡職調查。
- C. 向主管機關提交可疑交易報告。
- D. 聯絡該機構的法律顧問。

Answer: (SHOW ANSWER)

A customer who is the brother of a prominent member of a foreign judiciary is considered a politically exposed person (PEP) or a family member of a PEP. PEPs are individuals who hold or have held positions of public trust or influence in a foreign country, such as heads of state, senior politicians, high-ranking military officers, judges, or executives of state-owned enterprises. PEPs pose a higher risk of money laundering, corruption, or bribery due to their access to public funds, influence over policy decisions, or connections to other powerful individuals. Therefore, financial institutions are required to perform enhanced due diligence (EDD) on PEPs and their family members, as well as monitor their transactions and activities more closely.

EDD is a set of additional measures that go beyond the standard customer due diligence (CDD) to obtain more information about the customer, such as their source of wealth, source of funds, expected account activity, business relationships, and reputation. EDD also involves conducting ongoing reviews and updating the customer risk profile regularly. EDD helps the financial institution to mitigate the risks associated with PEPs and detect any signs of money laundering or other illicit activities.

ACAMS Study Guide¹, Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), pages 51-52 FATF Guidance on Politically Exposed Persons², pages 9-10, 13-14, 17-18 Wolfsberg Group Guidance on Politically Exposed Persons³, pages 2-3, 6-7

NEW QUESTION: 151

審計結果發現，有一項已獲得合規官批准的政策例外情況，審計員認定該政策例外違反了監管要求。

審計師該做什麼？

- A. 建議合規官如何適當應對政策例外情況。
- B. 將監理違規行為納入審計報告並報告給董事會。
- C. 諮詢法律顧問以確定政策例外的批准是否可以接受。
- D. 將監管違規行為納入審計報告，並建議合規官接受董事會的紀律處分。

Answer: (SHOW ANSWER)

The auditor should include the regulatory violation in the audit report and report it to the board of directors.

This is because the auditor has the responsibility to report any findings of non-compliance or material weaknesses in the institution's internal controls, policies, and procedures. The auditor should also provide recommendations for corrective actions and follow-up on their implementation. The board of directors has the ultimate oversight and accountability for the institution's compliance program and should be informed of any significant issues or risks that may affect the institution's reputation, operations, or regulatory status¹².

1: CAMS Certification Package - 6th Edition | ACAMS, Chapter 6: Developing an Effective Anti-Money Laundering Program, p. 125-126
2: The Wolfsberg Group, The Wolfsberg Anti-Money Laundering Principles for Correspondent Banking, October 2014, p. 7, <https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/Wolfsberg-Correspondent-Banking-Principles-2014.pdf>

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NEW QUESTION: 152

美國財政部 OFAC 域外影響力的主要目的是：

- A. 實現美國的外交政策與國家安全目標。
- B. 保護美國免受其經濟競爭對手的可疑貿易行為的侵害。
- C. 保護美國的盟國免受非盟國的經濟威脅。
- D. 協調 OFAC 和其他國家的域外覆蓋要求。

Answer: (SHOW ANSWER)

The Office of Foreign Assets Control (OFAC) is a department of the US Treasury that administers and enforces economic and trade sanctions imposed by the US against countries and groups of individuals, such as terrorists and narcotics traffickers. The sanctions can be either comprehensive or selective, using the blocking of assets and trade restrictions to accomplish foreign policy and national security

goals. The main purpose of the US Treasury Department for OFAC's extraterritorial reach is to apply these sanctions to any person or entity that is subject to US jurisdiction, or that engages in transactions involving US persons, US dollars, or US goods or services. This way, the US can exert pressure on the targets of the sanctions and prevent them from accessing the US financial system or market. OFAC's extraterritorial reach is authorized by Congressional legislation or presidential emergency powers, and is often based on UN Security Council resolutions or multilateral agreements.

Office of Foreign Assets Control (OFAC): Definition, Sanctions

About OFAC | Office of Foreign Assets Control

OFAC's Extraterritorial Reach: Purpose of the US Treasury Department

Reference: <https://www.natlawreview.com/article/aggressive-extraterritorial-reach-us-economic-sanctions-foreign-company-exposure-to>

NEW QUESTION: 153

根據歐盟第五號反洗錢指令，成員國要求實體對涉及高風險第三國國民的業務關係或交易採取強化的客戶盡職調查措施。這些要求包括哪些內容？（選擇三項）

- A. 獲得高階管理層的批准以建立或繼續業務關係
- B. 取得所有授權人員的護照副本
- C. 建立並驗證客戶端的位址
- D. 獲取有關預期或執行交易的原因的信息
- E. 獲取客戶的財務參考詳細信息
- F. 獲取有關客戶和受益所有人的資金來源和財富來源的信息

Answer: (SHOW ANSWER)

these are the enhanced customer due diligence measures that the 5th EU Money Laundering Directive requires for high-risk third country nationals. According to the directive, entities must obtain the approval of senior management for establishing or continuing the business relationship, obtain information on the reasons for intended or performed transactions, and obtain information on the source of funds and source of wealth of the customer and of the beneficial owner(s). These measures are intended to increase the transparency and scrutiny of the customers and their transactions, and to prevent the misuse of the financial system for money laundering or terrorist financing purposes. ACAMS Study Guide 6th Edition, Chapter 2, Section 2.3, page 56: "The EU's Fifth Anti-Money Laundering Directive".

ExamTopics, Question 456: "According to the 5th EU Money Laundering Directive, member states require entities to apply enhanced customer due diligence measures with respect to business relationships or transactions involving high-risk third country nationals. Which are included in these requirements? (Choose three.)"

NEW QUESTION: 154

關於金融行動特別工作小組 (FATF) 類型的區域機構 (FSRB)，哪一項是正確的？

- A. FSRB 為其成員國制定標準，以補充 FATF 的標準。
- B. FRSB 使用的工具包括訓練措施及其成員的相互評估。

- C. AFATF 成員國不能同時是 FSRB 的成員。
- D. 要成為 FSRB 的成員，國家必須已頒布AML 和反恐怖主義融資法律。

Answer: ([SHOW ANSWER](#))

FSRBs are regional bodies that work with FATF to promote the implementation of AML and CFT standards.

FSRBs are made up of member countries that have agreed to work together to combat money laundering and the financing of terrorism [1]. The tools used by FSRBs to promote the implementation of AML and CFT standards include training measures, mutual evaluations of its members, technical assistance, and the sharing of information. FSRBs may also adopt recommendations and best practices based on the FATF's 40 Recommendations.

NEW QUESTION: 155

一家金融機構 (FI) 的反洗錢合規官獲悉，該機構正在接受該國金融情報部門(FIU) 的調口。反洗錢合規官該做什麼？

(選兩個)

- A. 向高階領導和董事會通報調口情況。
- B. 與其他金融機構分享調口結果以幫助他們做好準備。
- C. 透過保留清晰的記錄來監控調口的進度。
- D. 向所有員工發送有關調口的資訊通訊。
- E. 盡快向金融情報機構提供所有信息，以避免延誤。

Answer: ([SHOW ANSWER](#))

According to the Certified Anti-Money Laundering Specialist (CAMS) Sixth Edition manual, the AML compliance officer should inform senior leadership and the board of the investigation (page 124) and monitor the progress of the investigation by keeping clear records (page 127). Additionally, the AML compliance officer should provide all information to the FIU as soon as possible to avoid delays (page 126).

According to the CAMS Manual, when a financial institution is being investigated by the financial intelligence unit (FIU), the AML compliance officer should inform senior leadership and the board of the investigation and monitor the progress of the investigation by keeping clear records. The manual states: "The AML compliance officer should inform senior leadership and the board of any investigations and then monitor the progress of the investigation by keeping clear records of what has been requested and submitted, deadlines and extensions granted, and any findings or reports received. This will allow the financial institution to respond effectively and efficiently to the investigation and take appropriate action if necessary." (CAMS Manual, Section 7.4.1 - Financial Intelligence Units, p. 366)

NEW QUESTION: 156

下列哪些業務需要增強或增加識別異常交易的場景？ (選兩個)

- A. 生口醫藥口品和醫療器材的公司、活躍於採礦業的公司
- B. 全國經營零售店的公司
- C. 經營醫院和醫療保健服務的公司

- D. 經營現金密集業務的公司無須遵守授權要求
- E. 經營現金密集業務的公司須遵守許可證要求

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 157

下列哪一種情況需要加強盡職調查 (EDD)? (選擇三項)

- A. 25 年前, 某低風險國家交通部長的私人秘書在鄰近的低風險國家的銀行開設了一個銀行帳戶。
- B. 現有的當地聯賽足球員試圖在其當地管轄範圍內的銀行開設銀行帳戶。
- C. 位於高風險國家的銀行試圖與低風險國家的銀行建立代理銀行關係。
- D. 居住在一個國家並擁有活期銀行帳戶的個人成為另一個國家的大使。
- E. 某國現任總理正試圖在另一個國家開設銀行帳戶。

Answer: ([SHOW ANSWER](#))

Enhanced Due Diligence (EDD) applies to high-risk customers and transactions, including politically exposed persons (PEPs), high-risk jurisdictions, and correspondent banking relationships.

Option C (Correct): Correspondent banking relationships with high-risk jurisdictions require EDD to prevent cross-border financial crime.

Option D (Correct): Ambassadors are considered PEPs, which require EDD due to corruption risks.

Option E (Correct): A current prime minister is a high-profile PEP, requiring EDD and ongoing transaction monitoring.

Why Other Options Are Incorrect:

Option A (Incorrect): The individual no longer holds a PEP position and is in a low-risk country, so EDD is not required.

Option B (Incorrect): A local footballer does not present a high financial crime risk warranting EDD.

EDD Best Practices for High-Risk Customers:

Verify the source of wealth and funds for PEPs.

Conduct ongoing transaction monitoring on high-risk accounts.

Apply stricter controls on correspondent banking with high-risk jurisdictions.

Reference:

FATF Recommendation 10 & 12 (EDD & PEPs)

Basel Committee's Correspondent Banking Guidelines

Wolfsberg Group Guidance on High-Risk Customers & EDD

NEW QUESTION: 158

在反洗錢調查的背景下, 關於資料隱私的哪一種說法最準確?

- A. 金融情報機構應記錄可疑活動報告 (SAR) 中包含的個人資料與其他機構共享的目的
- B. 任何被提交可疑報告的客戶都有權要求刪除其個人資料。
- C. 資料隱私法禁止所有司法管轄區的金融機構之間為了反洗錢調查的目的共享資訊。
- D. 組織在向相關金融情報機構 (FIU) 提交 SAR 之前, 必須證明客戶已選擇參與資訊共享。

Answer: ([SHOW ANSWER](#))

AML compliance must balance data privacy laws with financial crime prevention.

- * Option A (Correct): FIUs must document the purpose of SAR-related data sharing under FATF Recommendation 29 and GDPR compliance standards.
 - * Option B (Incorrect): Customers do not have the right to request redaction of personal data in SARs, as this would compromise AML enforcement.
 - * Option C (Incorrect): Many jurisdictions permit information sharing for AML purposes under formal agreements (e.g., 314(b) USA PATRIOT Act, GDPR exemptions).
 - * Option D (Incorrect): AML reporting requirements override opt-in privacy preferences due to the legal obligation to report suspicious activity.
- Reference: FATF Recommendation 29 (FIUs), GDPR Article 6(1)(e) (AML Data Processing), USA PATRIOT Act Section 314(b).

NEW QUESTION: 159

一位反洗錢專家剛剛制定並實施了反洗錢計劃。
下列哪一項是評估該計劃有效性的最佳資源？

- A. 監理機構
- B. 高階管理層成員
- C. 反洗錢專家
- D. 合格的獨立方/審計師

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) study guide, an effective anti-money laundering program should be subject to periodic independent testing by a qualified party, such as an internal or external auditor, a consultant, or a compliance professional¹. This ensures that the program is compliant with the applicable laws and regulations, and that it meets the standards of sound risk management and internal controls². The regulatory authorities, a member of senior management, or the anti-money laundering specialist may not have the necessary expertise, objectivity, or independence to conduct a thorough and unbiased evaluation of the program.

1: CAMS Study Guide, 6th Edition, Chapter 2, Section 2.3, page 51

2: CAMS Study Guide, 6th Edition, Chapter 2, Section 2.4, page 52

NEW QUESTION: 160

當某個司法管轄區被認定反洗錢/打擊資助恐怖主義控制措施鬆懈時，金融行動特別工作組 (FATF) 敦促其成員和所有其他司法管轄區採取哪些措施？

- A. 對該管轄區採取反措施
- B. 將來自該司法管轄區的客口視為高風險
- C. 立即停止與該司法管轄區開展業務
- D. 實施經濟制裁，直至FATF 另行通知

Answer: (SHOW ANSWER)

The FATF is an inter-governmental body that sets standards and promotes effective implementation of legal, regulatory and operational measures to combat money laundering, terrorist financing and other related threats to the integrity of the international financial system¹. The FATF identifies jurisdictions with serious strategic deficiencies in their anti-money laundering / counter financing of terrorism

(AML/CFT) regimes and issues public statements to warn the international community of the risks emanating from these jurisdictions². These jurisdictions are also known as high-risk jurisdictions subject to a call for action, or the "black list" in external sources². The FATF urges its members and all other jurisdictions to apply counter-measures to protect themselves from the money laundering and terrorist financing risks posed by these jurisdictions². Counter-measures are enhanced due diligence or restrictive measures that go beyond the normal AML/CFT requirements, such as requiring additional information or documentation, rejecting transactions, restricting business relationships, or terminating correspondent banking relationships³. The FATF also provides guidance on the types and levels of counter-measures that may be appropriate, depending on the specific risks and circumstances of each jurisdiction³.

1: What is the FATF? | FATF

2: High-Risk Jurisdictions subject to a Call for Action | FATF

3: Guidance on Counter Proliferation Financing - The Implementation of Financial Provisions of United Nations Security Council Resolutions to Counter the Proliferation of Weapons of Mass Destruction | FATF

NEW QUESTION: 161

透過一系列複雜的金融交易將非法收益從其來源中分離出來，這些交易旨在掩蓋審計線索並提供匿名性，這是什麼？

- A. 展示位置
- B. 結構化
- C. 分層
- D. 集成

Answer: (SHOW ANSWER)

Layering is the second stage of the money laundering process, in which the launderer moves the funds around to create distance and confusion between the source and the destination of the illicit proceeds. Layering often involves multiple transactions, such as wire transfers, shell companies, trusts, and offshore accounts, that make it difficult to trace the origin and ownership of the funds. Layering is intended to disguise the audit trail and provide anonymity for the launderer¹².

Placement is the first stage of the money laundering process, in which the launderer introduces the illicit proceeds into the financial system, often by breaking them into smaller amounts or using cash-intensive businesses¹².

Structuring is a technique used in the placement stage, in which the launderer deposits or withdraws cash in amounts below the reporting threshold to avoid detection or suspicion¹².

Integration is the third and final stage of the money laundering process, in which the launderer reintroduces the funds into the legitimate economy, often by purchasing assets, investing in businesses, or mixing them with legal income¹².

1: ACAMS (2020), Study Guide for the Certification Examination, 6th Edition, ACAMS, Miami, FL, USA, www.acams.org/en/cams-certification-package-6th-edition, pp. 12-14. 2: ACAMS (2020), CAMS Examination Preparation Video, 6th Edition, ACAMS, Miami, FL, USA, www.acams.org/en/cams-certification-package-6th-edition, Module 1.

NEW QUESTION: 162

歐盟反洗錢指令 (AMLD) 與歐盟成員國的當地反洗錢法規之間有什麼關係？(選兩個)

- A. 當地反洗錢法規優先於歐盟反洗錢法規的要求。
- B. 當地反洗錢法規可能會比歐盟反洗錢法規施加更多或更嚴格的要求。
- C. 歐盟反洗錢法提供了一個框架，成員國必須透過當地的反洗錢法規來實施。
- D. 歐盟反洗錢法規和當地反洗錢法規是獨立且不相關的法律架構。
- E. 歐盟反洗錢法規和當地反洗錢法規必須有相同的要求。

Answer: (SHOW ANSWER)

The EU AMLD provides the legal framework, but member states have discretion in implementation.

Option B (Correct): Countries can impose stricter AML laws than the minimum EU requirements.

Option C (Correct): AMLD sets the foundation, and member states implement local laws.

Option A (Incorrect): EU law takes precedence, and national laws must align with it.

Option D (Incorrect): AMLDs and local AML regulations are interlinked.

Option E (Incorrect): National AML rules do not have to be identical across all EU members.

Reference: 6th Anti-Money Laundering Directive (6AMLD), EU Financial Crime Regulations, FATF Mutual Evaluation Reports on EU Member States.

NEW QUESTION: 163

一家新開業的小型數位銀行最近任命的高級洗錢報告官 (MLRO) 已得到集團首席合規官的指示，實施有效的反洗錢交易監控系統，該系統可以識別異常和可疑交易。

專案在數位銀行選擇和實施反洗錢交易監控系統時需要考慮哪些重要因素？(選兩項)

- A. 供應商是否已記錄用於設計系統和資料整合模式的適當內部控制
- B. 審計、調閱和報告系統產生的警報詳細資訊的權限和使用者存取設定是否與其他銀行使用的權限和使用者存取設定一致
- C. 監控系統是否適合銀行的規模、活動、複雜性和風險
- D. 是否可以設定監控系統，使銀行能夠對交易活動進行趨勢分析，並識別異常的業務關係和交易

Answer: (SHOW ANSWER)

* C: "The system must be adequate and proportionate to the bank's size, activities, complexity, and risk profile. A one-size-fits-all solution is not appropriate."

* D: "Effective monitoring systems should support the detection of unusual trends and business relationships, facilitating meaningful analysis and alerts." (CAMS 6th Edition, Transaction Monitoring System Requirements) Incorrect:

* A: Vendor internal controls are important, but not a top selection criterion for AML system effectiveness.

* B: Permissions should be appropriate for the bank's structure, not just compared to other banks.

References:

CAMS 6th Edition, Selecting and Implementing Monitoring Systems

NEW QUESTION: 164

台灣賭場的合規官發現，賭場連續幾天收到一位客戶的多筆現金存款，金額略低於大額交易報告(LTR) 限額。該客戶使用了三個不同的投注帳戶。

下一步該怎麼做？

- A. 依照內部報告程序將活動升級為可疑活動並報告給相關部門
- B. 告知客戶他們的活動可疑並要求解釋
- C. 在客戶的帳戶中註明客戶的賭博活動經常在報告限額以下進行
- D. 聯絡執法單位對客戶的財務活動展開調查

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 165

一位顧客走進銀行，在櫃員排隊等候時顯得有些不安。當顧客走到出納員面前時，他變得非常緊張，並要求將一張大本票兌現並以 100 美元的鈔票支付給他。

交易完成後，櫃員該做什麼？

- A. 與銀行帳戶進行後續協商
- B. 向客戶提交 SAR
- C. 監控客戶帳號的後續狀況
- D. 在當天結束前向客戶提交點擊率

Answer: ([SHOW ANSWER](#))

A customer who is nervous, uneasy, or in a hurry to cash a large cashier's check may be trying to launder money or evade reporting requirements. The teller should complete the transaction as normal, but also flag the customer's account for further monitoring and review. The teller should look for any unusual or suspicious patterns of activity, such as frequent large cash transactions, transfers to or from high-risk jurisdictions, or transactions that do not match the customer's profile or expected behavior. The teller should also document the transaction and the customer's demeanor, and report any findings or concerns to the appropriate authority within the bank.

The teller should not confer with the bank's account going forward, as this may alert the customer to the bank's suspicion or compromise the investigation. The teller should not file a SAR on the customer, unless there are other grounds to suspect money laundering or terrorist financing, as this may be premature or unnecessary.

The teller should not file a CTR on the customer by the end of the day, unless the transaction exceeds the threshold of \$10,000, as this is a legal requirement for cash transactions in the US.

[ACAMS Study Guide for the CAMS Certification Examination, 6th Edition], Chapter 4: Conducting or Supporting the Investigation Process, pp. 103-104, 107-108.

Suspicious Activity Reporting - Overview, Federal Financial Institutions Examination Council, April 2018, pp. 1-2, 4-5.

Currency Transaction Reporting - Overview, Federal Financial Institutions Examination Council, April 2018, pp. 1-2, 4-5.

17 AML Analyst Interview Questions and Answers, CLIMB, July 15, 2022.

NEW QUESTION: 166

下列哪一項員工行為不會引發 AML 危險訊號？

- A. 一名員工過著奢侈的生活，而他或她的薪水無法支撐這種生活方式。
- B. 員工涉及過多未解決的異常。
- C. 員工利用公司資源促進私人利益。
- D. 員工透過股票市場的投資獲得高額收益。

Answer: (SHOW ANSWER)

While this behavior may warrant scrutiny in certain circumstances, it is not inherently suspicious or indicative of money laundering. In contrast, the other behaviors listed (living beyond one's means, excessive unresolved exceptions, and using company resources for personal gain) may suggest that an employee is engaging in or facilitating money laundering activity.

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NEW QUESTION: 167

古董交易是否有助於洗錢？

- A. 不會，因為古董市場規模較小，異常交易會引起關注
- B. 不，因為古董銷售和購買在全球範圍內受到嚴格監管
- C. 是的，因為現金通常隱藏在古董本身
- D. 是的，因為古董價格很高並且通常很容易運輸

Answer: C (LEAVE A REPLY)

Antiques are a potential tool for money laundering because they can be used to conceal, move, and convert illicit funds. Antiques can be of high value and often easily transported across borders, making them attractive for criminals who want to evade detection and reporting. Antiques can also be difficult to value and authenticate, creating a lack of transparency and accountability in the market. Criminals can exploit this to inflate or deflate the prices of antiques, or to use them as collateral for loans or other transactions. Antiques can also be used to layer or integrate illicit funds into the legitimate economy, by selling them through auction houses, dealers, or online platforms.

CAMS Certification Package - 6th Edition, Chapter 4: Conducting and Supporting the Investigation Process, pp. 97-98.

Anti-money laundering and the art and antiquities market - a US and UK perspective, Mishcon de Reya LLP, 2022.

Antiques: an unconventional money laundering tool, The Express Tribune, 2023.

Art and Antiquities an Attractive Market for Money Laundering, FATF Argues, OCCRP, 2021.

NEW QUESTION: 168

亞太金融行動特別工作小組 (FATF) 式的區域機構如何幫助其成員落實FATF 的建議？ (選兩個)

- A. 推廣允許對行政機關扣押令提出司法質疑的法律
- B. 贊同根據各成員國頒布的示範法定義洗錢的法規
- C. 促進成員司法管轄區採用和實施國際公認的 AML 措施
- D. 鼓勵該地區的反洗錢合作工作
- E. 請會員保留與其所在地區相關的地區洗錢和恐怖分子融資問題清單

Answer: (SHOW ANSWER)

The Asian/Pacific Financial Action Task Force-Style Regional Body (APG) helps its members implement recommendations from the FATF by facilitating the adoption and implementation of internationally accepted AML measures by member jurisdictions (CAMS Manual, 6th Edition, Page 22). The APG also encourages cooperative AML efforts in the region, which can include information-sharing and mutual evaluations to assess member compliance with FATF recommendations (CAMS Manual, 6th Edition, Page 25). Therefore, options C and D are the correct answers.

NEW QUESTION: 169

合規官發現流行金融口品有潛在的重大風險。進一步調口顯示，沒有緩解控制措施，合規官員應該採取哪一種行動？

- A. 口動一個長期專案來彌補控制缺陷
- B. 注意風險並在下一輪政策和程序審口期間解決它
- C. 立即停止提供口品，並僅在實施有效的永久緩解措施後才提供
- D. 實施臨時緩解措施，以便有效管理風險，直到製定永久計劃

Answer: (SHOW ANSWER)

as there's NO mitigating control, the temporary control system must be developed and implemented until the permanent mitigating control is developed and implemented.

NEW QUESTION: 170

與使用電子資金轉帳相關的洗錢三個指標是什麼？選出 3 個答案

- A. 沒有明顯商業原因的資金轉入或轉出金融保密天堂
- B. 從一家大公司的帳口定期頻繁轉賬，據稱是口購商品的付款
- C. 同一個人向不同帳口接收或發送資金
- D. 與合法合約、商品或服務沒有明顯聯繫的付款或收據

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) resources, electronic funds transfers (EFTs) are transactions that involve the movement of funds electronically from one account to another, either within the same financial institution or across different institutions, domestically or internationally¹. EFTs can be used for legitimate purposes, such as facilitating trade, commerce, and remittances, but they can also be exploited by money launderers to conceal the origin, ownership, and destination of illicit funds². Some of the indicators of money laundering associated with using EFTs are:

Funds transfers to or from a financial secrecy haven without an apparent business reason. Financial secrecy havens are jurisdictions that offer a high degree of banking secrecy, low or no taxes, lax regulation and supervision, and weak or non-existent anti-money laundering and counter-terrorist financing (AML/CTF) measures³. Money launderers may use these havens to hide their illicit funds, evade taxes, and avoid scrutiny from authorities. Funds transfers to or from these havens without a clear or plausible explanation may indicate an attempt to launder money or finance terrorism. Funds transfers are received or sent from the same person to or from different accounts. This may indicate a layering technique, which is the process of moving funds through multiple accounts, institutions, or jurisdictions to obscure the audit trail and the source and ownership of the funds⁴. Money launderers may use this technique to avoid detection, reporting, or freezing of their funds by authorities or financial institutions.

Payment or receipts with no apparent link to legitimate contracts, goods or services. This may indicate a trade-based money laundering technique, which is the process of using trade transactions to disguise the movement of illicit funds, either by over- or under-invoicing, misrepresenting the quantity or quality of goods, or falsifying documents. Money launderers may use this technique to transfer value across borders, evade taxes or customs duties, or justify the movement of funds that have no legitimate origin or purpose.

The other option is incorrect because:

Regular and frequent transfers from the account of a large company said to be payment for goods bought on credit is not necessarily an indicator of money laundering associated with using EFTs. This may be a normal business practice for some companies that have a high volume of transactions or a long-term relationship with their suppliers or customers. However, this may also be a red flag if the company is not well-known, has no physical presence, has no apparent business activity, or is located in a high-risk jurisdiction. Therefore, this option requires further investigation and verification before concluding that it is an indicator of money laundering.

1: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 104 2: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 105 3: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 107 4: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 106 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p.

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NEW QUESTION: 171

從歷史上看，導遊每月平均存入10,000 美元現金。過去三個月，每月存款平均為10萬美元。當金融機構詢問存款增加的原因時，導遊解釋□，鎮上舉辦了許多會議，因此生意大幅增加。金融機構應採取哪些進一步行動？

- A. 立即終止關係
- B. 安排定期活動審□
- C. 進行進一步調□，適當時向當局報告該活動並考慮終止關係
- D. 進行進一步調□，如有必要，向當局報告該活動並限制未來的交易

Answer: (SHOW ANSWER)

The financial institution should perform further investigation to verify the legitimacy of the tour guide's explanation and the source of funds. If the investigation reveals any suspicious or unusual activity, such as inconsistent cash flow patterns, involvement of high-risk customers or jurisdictions, or indications of money laundering or terrorist financing, the financial institution should report the activity to the authorities and consider terminating the relationship. The financial institution should also document the investigation and its findings, and update the customer's risk profile accordingly.

CAMS Study Guide - 6th Edition, Chapter 4, page 112

CAMS Certification Exam Outline, Domain 1, Task 1.2, Skill 1.2.2

ACAMS MoneyLaundering.com, Article: "How to Conduct Effective Customer Due Diligence"

NEW QUESTION: 172

一家大型金融機構的合規官由高階管理層指派，在另一家機構採取監管執法行動後，領導一個團隊對該機構的客戶入職計畫進行內部審閱和可能的修訂。

合規官應該先執行哪一步？

- A. 審閱機構的風險評估
- B. 修訂第一線員工訓練教材
- C. 對高風險客戶進行強化盡職調查
- D. 解決客戶驗證的實質差異

Answer: (SHOW ANSWER)

The compliance officer should perform the first step of reviewing the institution's risk assessment before implementing any changes to the customer onboarding program. The risk assessment is a key component of the AML compliance program, as it identifies and measures the institution's exposure to money laundering and terrorist financing risks. The risk assessment should be updated regularly and reflect the institution's products, services, customers, geographic locations, and delivery channels. By reviewing the risk assessment, the compliance officer can determine the adequacy and effectiveness of the current customer onboarding program and identify any gaps or weaknesses that need to be addressed. The compliance officer can also benchmark the institution's risk assessment against the regulatory expectations and best practices in the industry.

The other steps are also important, but they should be performed after the risk assessment review. Revising training materials for frontline staff, conducting enhanced due diligence on high risk customers, and resolving substantive discrepancies in customer verification are all part of the customer onboarding program, but they depend on the risk assessment to provide the appropriate level of controls and procedures. For example, the training materials should reflect the risk assessment results and the revised customer onboarding policies. The enhanced due diligence should be applied to customers who pose a higher risk according to the risk assessment criteria. The customer verification should be consistent with the risk assessment and the customer identification program.

AML KYC Onboarding Lifecycle Process Flow | Guide - AdvisoryHQ

New EBA AML Guidelines on the use of Remote Customer Onboarding Solutions - Bird & Bird KYC Onboarding Process 2023 - AML requirements - Sumsb Review of any AML/CFT program begins with the Risk Based Approach. It should first check the internal system to identify risk factors and design program accordingly.

NEW QUESTION: 173

一位商人請求一家歐洲私人銀行開設編號帳口或備用名稱帳口。根據巴塞爾銀行監理委員會的原則，下列哪一個是銀行家應該問的最重要的問題？

- A. 誰會控制該帳口？
- B. 如果商人過世，誰會繼承收益？
- C. 帳口中存入多少錢？
- D. 我該記錄什麼開口日期！'

Answer: A (LEAVE A REPLY)

According to the Basel Committee on Banking Supervision principles, the most important question the banker should ask when opening a numbered or alternate name account is who will control the account. This is because such accounts pose a higher risk of money laundering and terrorist financing, as they can be used to conceal the identity and beneficial ownership of the funds. Therefore, the banker should perform enhanced due diligence and verify the identity and source of funds of the person who has the authority to operate the account, as well as the purpose and nature of the business relationship¹² The other questions are less relevant or secondary to the issue of control. The inheritance of the proceeds in the event of the businessman's death is a matter of succession law and does not affect the identification of the beneficial owner. The amount of money deposited into the account may indicate the level of risk, but does not reveal the origin or destination of the funds. The account-opening date is a procedural detail that does not affect the compliance with the anti-money laundering and counter-terrorist financing standards¹²

1: Basel Committee on Banking Supervision - Core principles for effective banking supervision, 2012, Principle 14 and Essential Criterion 14.1

2: Basel Committee on Banking Supervision - Sound management of risks related to money laundering and financing of terrorism, 2014, Paragraphs 30 and 31

NEW QUESTION: 174

沃爾夫斯堡集團 2012 年的 原則（或私人銀行）確立了這一點。

- A. 以風險為基礎的方法不足以解決私人銀行業務帶來的高風險
- B. 私人銀行同意客戶實際所有權的透明度是必要且適當的。
- C. 對私人銀行客戶進行盡職調查的要求對於防止上游犯罪是必要的。
- D. 私人銀行需要更好地協調和調整其全球反洗錢控制環境策略。

Answer: (SHOW ANSWER)

NEW QUESTION: 175

哪些危險訊號表示銀行員工可能參與洗錢活動？（選兩個）

- A. 員工薪資無法支撐的奢華生活方式
- B. 當員工有足夠的假期時不願意休假
- C. 超過一個時期未能達成業務目標
- D. 為特定客戶提供比平常更長的服務

E. 與顧客保持友誼並去餐廳、遊戲和其他活動

Answer: (SHOW ANSWER)

The two red flags indicating potential engagement of a bank employee in money laundering are A. Lavish lifestyle that cannot be supported by an employee's salary, and E. Maintaining friendships with customers and going to restaurants, games, and other events. A bank employee who has a lifestyle that cannot be supported by their salary could be receiving money from illicit activities. Similarly, if the employee is maintaining friendships and going to social events with customers, they could be receiving money in exchange for providing special services. These behaviors should be monitored closely to ensure that the employee is not engaging in activities that could be linked to money laundering.

NEW QUESTION: 176

在審閱涉嫌與房地產洗錢有關的交易時，哪一項最相關？

- A. 資金的來源
- B. 資金的受益所有人
- C. 付款時所使用的幣種
- D. 參與交易的金融機構

Answer: (SHOW ANSWER)

Money laundering through real estate transactions involves integrating illicit funds into the legitimate financial system while providing a relatively "safe" property investment. In this context, the most relevant factor to examine is the beneficial owner of the asset. Identifying the true owner behind a property helps uncover potential money laundering schemes. Criminals often use third parties, shell companies, or complex ownership structures to distance the transaction from the source of illicit funds. Investigating the beneficial owner's identity is crucial for detecting and preventing real estate-related money laundering¹².

References:

Understanding money laundering through real estate transactions

What Is Money Laundering? - Investopedia

NEW QUESTION: 177

合規官員正在審閱電匯部門上個月的活動，並發現來自客戶帳戶的異常電匯。客戶活動審閱應包含哪些資訊？

- A. 近期儲蓄活動紀錄
- B. 透過電話和網路發起的電匯請求
- C. 上一年每月處理的電匯總數
- D. 銀行是否透過代理行處理電匯

Answer: (SHOW ANSWER)

Wire transfer requests initiated by phone and internet should be included in the review of the customer's activity, as they may indicate a higher risk of fraud, identity theft, or money laundering. Phone and internet wire transfers are more vulnerable to cyberattacks, phishing, or social engineering, and may bypass some of the verification and authentication procedures that are applied to in-person or paper-based requests. Therefore, the compliance officer should monitor these requests for any signs of

unusual or suspicious activity, such as changes in beneficiary, amount, frequency, or destination of the wires.

ACAMS CAMS Certification Study Guide, 6th Edition, page 41

ACAMS CAMS Certification Exam Outline, 6th Edition, Domain 2, Task 2.1

ACAMS CAMS Certification Video Training Course, Module 2, Lesson 2.1

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 325

NEW QUESTION: 178

一名執法人員致電銀行反洗錢調口員，要求提供有關上個月提交的可疑交易報告的資訊。調口人員該如何應對？

- A. 將代理商轉介給銀行的合規官
- B. 將資訊傳送到代理提供的位址
- C. 在通話期間分享所需的訊息
- D. 發布資訊前需要搜索令

Answer: (SHOW ANSWER)

A U.S. bank must block or reject an international funds transfer when there is an OFAC designated party to the transaction, regardless of the beneficiary or the correspondent bank. This is because the U.S. bank is prohibited from dealing with any person or entity that is on the Specially Designated Nationals and Blocked Persons List (SDN List) or subject to any other OFAC sanctions program¹. The SDN List includes individuals, groups, and entities, such as terrorists and narcotics traffickers, that are designated under programs that are not country-specific². The U.S. bank must also report any blocked or rejected transactions to OFAC within 10 business days³.

1: FFIEC BSA/AML Office of Foreign Assets Control - Office of Foreign ... 2: Specially Designated Nationals And Blocked Persons List (SDN) Human ... 3: [Reporting Blocked Transactions | Office of Foreign Assets Control]

NEW QUESTION: 179

一位客口為多層次傳銷公司開設了一個銀行帳口。該帳口的借方和貸方項目眾多且非常複雜。此外，還有很多國際交易。此外，資金也從公司轉移到另一個司法管轄區的客口個人帳口。

執法部門應採取哪兩個步驟來調口此事？（選兩個）

- A. 確定帳口的簽章人是誰
- B. 向銀行詢問這家多層次傳銷公司的歷史
- C. 檢口從公司到個人的資金流動，以確定其是否合法
- D. 檢口從當地金融情報部門收到的可能的可疑活動報告訊息

Answer: (SHOW ANSWER)

The correct answer is A and C. Law enforcement should determine who are the signatories on the account and examine the flow of money from the company to the individual in an effort to determine if it is legitimate.

These steps would help to identify the source and destination of the funds, the purpose and nature of the transactions, and the possible involvement of money laundering or other financial crimes. Asking the bank for the history of the multi-level marketing company (B) may not be relevant or useful, as the

company may have a legitimate business model or a false front. Examining possible Suspicious Activity Report information received from the local Financial Intelligence Units (FIUs) may be helpful, but it is not a necessary step, as the bank may not have filed any reports or the reports may not contain sufficient information.

ACAMS CAMS Certification Video Training Course¹, Module 4: Conducting or Supporting the Investigation Process, Lesson 1: Investigating Techniques for Law Enforcement
ACAMS CAMS Certification Study Guide², Chapter 4: Conducting or Supporting the Investigation Process, Section 4.1: Investigating Techniques for Law Enforcement, pp. 125-126

NEW QUESTION: 180

一名新的合規官員正在審查該銀行的反洗錢計劃，並注意到風險評估已於六個月前完成。此後，該銀行收購了另一家金融機構，更名為內部記錄小組，並簡化了現金處理程序。哪些因素導致合規官更新銀行的風險評估？

- A. 銀行收購了另一家機構
- B. 內部記錄組已重新命名
- C. 簡化了現金處理程序
- D. 風險評估已於六個月前完成

Answer: (SHOW ANSWER)

Assessing AML/CFT is an ongoing and evolving component of maintaining a compliant AML/CFT program.

Evaluating the risk-scoring model and conducting the risk assessment itself may need to be performed annually, every 18 to 24 months, before the launch of a new product or when an acquisition of another financial institution occurs.

NEW QUESTION: 181

歐盟反洗錢指令的關鍵目標是什麼？

- A. 在整個歐盟建立一致的監管環境以防止洗錢
- B. 解決歐盟國家的支付控制問題，以減少洗錢
- C. 允許成員國與歐盟金融情報機構 (FIU) 合作討論立法草案
- D. 建立金融機構 (FI) 網絡，共同防止整個歐盟洗錢

Answer: (SHOW ANSWER)

The key goal of EU Directives on money laundering is to establish a consistent regulatory environment across the EU to prevent money laundering and terrorist financing, and to align EU policy with international standards and best practices. EU Directives are legal acts that set out the objectives and principles that member states must achieve, but leave the choice of methods and measures to the national authorities. EU Directives on money laundering aim to harmonize the rules and obligations for FIs and other obliged entities in the areas of customer due diligence, record-keeping, reporting, supervision, and sanctions. They also aim to address the emerging threats and vulnerabilities of the financial system, such as the use of virtual assets, prepaid cards, high-risk third countries, and beneficial ownership. By creating a consistent regulatory environment across the EU, the Directives seek to enhance the effectiveness and cooperation of the AML

/CFT regime, and to protect the integrity and stability of the internal market and the financial system.

1: Guide to EU Anti Money Laundering Directives (AMLD) - ComplyAdvantage1

2: Directive - 2015/849 - EN - Fourth Anti-Money Laundering Directive - EUR-Lex2

3: EU context of anti-money laundering and countering the financing of terrorism3

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NEW QUESTION: 182

巴塞爾銀行監理委員會發布了《健全洗錢與恐怖主義融資相關風險的管理》指引。在識別和接受客戶方面，它建議銀行：（選擇兩個）

- A. 制定根據風險而改變的客戶盡職調查政策和程序。
- B. 禁止提供客戶編號帳戶，即使建立了收集和維護盡職調查資訊的程序。
- C. 制定政策和程序來識別和驗證客戶、實際受益人以及任何可以代表其客戶進行交易的個人。
- D. 制定政策和程序以確保所有客戶的盡職調查活動相同。
- E. 制定鼓勵在建立和驗證盡職調查資訊的同時處理交易的政策和程序。

Answer: (SHOW ANSWER)

The Basel Committee's AML guidelines emphasize risk-based customer due diligence (CDD) and beneficial ownership transparency.

Option A (Correct): CDD policies must be risk-based to apply enhanced due diligence (EDD) for high-risk customers and simplified due diligence (SDD) for low-risk customers.

Option C (Correct): Banks must verify the identity of customers and beneficial owners to prevent financial crime risks.

Why Other Options Are Incorrect:

Option B (Incorrect): Numbered accounts are not strictly prohibited but require strict transparency and due diligence measures.

Option D (Incorrect): CDD procedures must be risk-based, not uniform across all customers.

Option E (Incorrect): Transactions should not be processed until full due diligence is completed, except in rare cases where regulatory exceptions apply.

Best Practices for Risk-Based Customer Due Diligence:

Apply EDD for high-risk entities (e.g., PEPs, offshore companies).

Ensure full beneficial ownership transparency.

Implement ongoing transaction monitoring for risk assessment.

Reference:

Basel Committee's "Sound Management of ML/TF Risks"
FATF Recommendation 10 (Customer Due Diligence)
6th EU AML Directive (6AMLD) on Beneficial Ownership Transparency

NEW QUESTION: 183

哪些風險因素與獲取和服務那些被認為具有較高金融犯罪風險的客戶的銀行業務活動有關？（選三個）

- A. 合規風險
- B. 聲譽風險
- C. 操作風險
- D. 制裁風險
- E. 貸款風險

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 184

一家數位銀行新任命的高級洗錢報告官 (MLRO) 已被指示實施有效的反洗錢交易監控系統。

選擇和實施反洗錢制度需要考慮哪些重要因素？（選兩個）

- A. 監控系統是否適合銀行的規模、活動、複雜性和風險。
- B. 供應商是否已記錄用於設計系統和資料整合模式的適當的口部控制。
- C. 審計、調閱和報告系統產生的警報詳細資訊的權限和使用者存取設定是否與其他銀行使用的權限和使用者存取設定一致。
- D. 是否可以設定監控系統，使銀行能夠對交易活動進行趨勢分析，並識別異常的業務關係和交易

Answer: ([SHOW ANSWER](#))

An effective AML transaction monitoring system must align with the bank's operational complexity, risk exposure, and analytical capabilities.

* Option A (Correct): The system must be tailored to the bank's specific risk profile to ensure effectiveness.

* Option D (Correct): A strong AML system should support trend analysis to identify long-term suspicious behaviors.

Why Other Options Are Incorrect:

* Option B (Incorrect): While vendor controls are important, they do not determine system suitability.

* Option C (Incorrect): User access settings should be based on the bank's internal risk framework, not industry standards alone.

Best Practices for Implementing an AML Monitoring System:

- * Ensure scalability to adapt to evolving financial crime risks.
- * Leverage AI and machine learning to enhance detection accuracy.
- * Integrate real-time screening and transaction trend analysis.

Reference:

FATF Recommendation 10 (Customer Due Diligence & Monitoring)

Wolfsberg Group Guidance on AML Technology Implementation

Basel Committee's Guidelines on Transaction Monitoring System Effectiveness

NEW QUESTION: 185

為什麼有組織犯罪集團經常使用幌子公司？（選兩項）

- A. 由於幌子公司未註冊，因此無需繳納所得稅和其他銷售稅。
- B. 因為使用多個幌子公司可以更輕鬆地控制整個經濟部門。
- C. 因為它們通常受到銀行和其他金融服務提供者較寬鬆的盡職調查要求。
- D. 由於幌子公司一般比合法公司收取更高的價格，因此利潤率更高。
- E. 因為他們可以使用公司的銀行帳戶將存款與合法企業的存款混在一起。

Answer: B,E (LEAVE A REPLY)

Organized crime groups often use front companies to disguise the origin and destination of their illicit funds, and to integrate them into the legitimate economy. Front companies are businesses that appear to be engaged in lawful activities, but are actually controlled by criminals for money laundering purposes.

One reason why organized crime groups use front companies is to gain control over an entire sector of the economy, such as construction, transportation, or gambling. By using multiple front companies, they can create a network of interrelated businesses that can manipulate prices, evade taxes, and influence public contracts. This can give them a competitive advantage over legitimate businesses, and allow them to launder large amounts of money through seemingly legitimate transactions.

Another reason why organized crime groups use front companies is to commingle their illicit funds with those of legal businesses. By using the bank accounts of front companies, they can deposit cash from criminal activities along with the revenues from legitimate operations, making it harder to trace the source of the funds.

They can also transfer funds between different front companies, or use them to pay for goods and services, creating layers of transactions that obscure the money trail.

CAMS Study Guide - 6th Edition, Chapter 2, Section 2.2, page 43

A Guide to the 6th Anti-Money Laundering Directive, Part 2, page 9

Money Laundering and Financial Crimes, Chapter 2, page 29

NEW QUESTION: 186

哪些人必須始終遵守所有外國資管制辦公室 (OFAC) 規定？（選擇三項）

- A. 美國公民，不論身在何處
- B. 無論身處何地，均提供美元帳戶的非美國金融機構
- C. 無論位於何處，均提供美國原產商品的商家
- D. 在美國註冊成立的實體及其國外分公司。
- E. 無論身在何處的美國永久居民外國人。

Answer: (SHOW ANSWER)

OFAC sanctions apply extraterritorially to ensure U.S. financial and economic interests are protected.

Option A (Correct): U.S. citizens must comply with OFAC sanctions regardless of where they are located.

Option D (Correct): U.S.-incorporated entities and their foreign branches are required to follow OFAC restrictions.

Option E (Correct): Permanent U.S. resident aliens are subject to OFAC compliance even outside the U.S.

Option B (Incorrect): Non-U.S. financial institutions are not directly subject to OFAC unless they have a U.S.

presence or deal in USD transactions.

Option C (Incorrect): Selling U.S.-origin goods does not automatically subject merchants to OFAC laws, unless they are in a sanctioned jurisdiction.

Reference: OFAC Regulations, U.S. Treasury Guidance on Sanctions Compliance, USA PATRIOT Act Section 311.

NEW QUESTION: 187

為新的商業客戶建立銀行帳戶。該公司成立於五年前，地址位於另一個州。該企業網站除了聲明其是房地

企業外，幾乎沒有其他細節。一位校長擁有國際電話號碼，並且似乎居住在另一個國家。另一位校長在一輛休閒車上工作。在這種情況下，什麼應得加強盡職調查？

- A. 空殼公司
- B. 人口販子
- C. 政治公眾人物
- D. 透過房地產洗錢

Answer: (SHOW ANSWER)

Money laundering through real estate is a common method of disguising the source and ownership of illicit funds. Real estate transactions often involve large amounts of money, complex legal structures, and cross-border transfers, which can obscure the true nature and origin of the funds. The new business customer in this scenario raises several red flags that warrant enhanced due diligence, such as:

- * The business was established five years ago but has a vague website and no physical presence in the state where it is registered.
- * One of the principals has an international phone number and lives abroad, which could indicate a foreign shell company or a politically exposed person.
- * The other principal works out of a recreational vehicle, which could suggest a lack of legitimate business activity or income.
- * The business claims to be a real estate business, but does not provide any details about its projects, clients, or partners.

These factors suggest that the business may be involved in money laundering through real estate, either by purchasing properties with illicit funds, using properties to generate illegal income, or selling properties to launder money. Therefore, the financial institution should conduct enhanced due diligence to verify the identity, background, and source of funds of the business and its principals, as well as the purpose and nature of the account relationship.

ACAMS Study Guide for the CAMS Certification Examination - 6th Edition, Chapter 2: Money Laundering Risks and Methods, pp. 46-47 Enhanced Due Diligence in Construction and Real Estate, by

James Swenson, Ethixbase 360 Due Diligence & Legal Considerations in Commercial Real Estate, by Justia

NEW QUESTION: 188

位於亞利桑那州的一家銀行正在考慮為新客戶申請貸款。貸款的抵押品是佛羅裡達州的房產。該貸款將以一家有限公司（LLC）的名義提供，其所有權不會向銀行披露。這家有限責任公司由一位紐約律師成立。

LLC 將透過每月 9,000 美元的電匯償還貸款，這超出了每月所需的還款額。

哪些方面顯示存在洗錢的可能性？

- A. 有限責任公司的所有權不向銀行揭露
- B. 抵押品是佛羅裡達州的房產，但不在亞利桑那州
- C. 9,000 美元的還款表明潛在的結構調整
- D. 與該客戶相關的律師不在銀行貸款範圍內

Answer: (SHOW ANSWER)

According to the ACAMS study guide, one of the red flags for money laundering in loan transactions is "the use of shell companies or other legal entities whose ownership is not transparent or whose beneficial owners are unknown" (p. 223). Money launderers may use such entities to hide their identity and the source of their funds, or to create complex layers of transactions to obscure the trail of money. The other options are not necessarily indicative of money laundering risk, as they could be explained by legitimate factors such as the location of the property, the repayment schedule, or the choice of attorney.

ACAMS. (2020). Study Guide for the Certification Examination for Anti-Money Laundering Specialists (6th ed.). Miami, FL: ACAMS.

MLO Mentor: Anti-Money Laundering 1

Compliance Obligations of Certain Loan or Finance Company Affiliates of Federally Regulated Banks and Other Financial Institutions 2

NEW QUESTION: 189

反賄賂和反腐敗法規的主要目的是什麼？

- A. 禁止個人或實體向政府官員或國營企業員工支付任何有價之物以獲得不正當的商業利益
- B. 禁止政府高層將非法所得兌換成合法貨幣
- C. 防止腐敗的外國對手利用非法資金幹預選舉
- D. 防止高級政治人物使用非法手段逃稅

Answer: (SHOW ANSWER)

* A: The main objective of anti-bribery and corruption regulations is to prohibit bribes to government officials or employees of state-owned enterprises for the purpose of obtaining or retaining business or securing improper advantages.

* "Anti-bribery and corruption regulations, such as the FCPA and UK Bribery Act, prohibit offering anything of value to public officials to gain a business advantage." (CAMS 6th Edition, Anti-Bribery and Corruption) References:

NEW QUESTION: 190

客戶代表多個受益所有人在經紀自營商開設公司帳戶，並設定長期投資目標。客戶將 2,550 萬美元存入帳戶，三天後將 500 萬美元轉入海外銀行。此後不久，客戶開始大量購買比索。合規官員收到有關資金流動的詢問。開戶後一個月內，客戶就會耗盡帳戶。
哪兩個危險訊號應促使公司合規官採取行動？（選兩個。）

- A. 新帳戶存款為 2,550 萬美元
- B. 代表多位受益所有人開設公司帳戶
- C. 合規官收到有關資金流動的詢問
- D. 客戶聲明的投資目標並未反映帳戶活動

Answer: (SHOW ANSWER)

A corporate account opened on behalf of several beneficial owners is a red flag because it may indicate an attempt to conceal the identity or source of funds of the ultimate beneficiaries¹. The customer's stated investment goal of long-term investment is not reflective of the account activity, which involves frequent and large transfers, currency exchanges, and account depletion within a short period of time. This discrepancy may suggest that the customer is using the account for money laundering or other illicit purposes².

= 1: ACAMS CAMS Certification Video Training Course - Exam-Labs, Module 3, Lesson 4, Topic: Corporate Accounts 2: ACAMS CAMS Certification Video Training Course - Exam-Labs, Module 3, Lesson 4, Topic: Customer Profile and Account Activity

NEW QUESTION: 191

FATF 建議中的哪個關鍵方面最準確地描述了為國家和金融機構 (FI) 在 AML/CFT 制度中分配資源的重要基礎？

- A. 實施有針對性的金融制裁
- B. 進行全國同儕評估
- C. 執行司法協助
- D. 應用風險為本的方法

Answer: (SHOW ANSWER)

The risk-based approach (RBA) is an essential foundation of the FATF Recommendations, as it allows countries, competent authorities and financial institutions to adopt a more flexible set of measures to target their resources more effectively and apply preventive measures that are commensurate to the nature of risks, in order to focus their efforts in the most effective way. The RBA is not optional, but a prerequisite for the effective implementation of the FATF Standards. The RBA requires the identification, assessment and understanding of the ML/TF risks to which the countries and FIs are exposed, and the implementation of AML

/CFT measures that are proportionate and tailored to those risks. The RBA is not a "zero failure" approach, but a way to mitigate the risks in the most efficient and effective manner.

FATF Recommendations, Introduction, page 11

FATF Guidance on the Risk-Based Approach to Combating Money Laundering and Terrorist Financing - High Level Principles and Procedures, page 3 Risk-based Approach (RBA), What is the Risk-based Approach (RBA)?

NEW QUESTION: 192

金融機構 (FI) 因未能實施有效的反洗錢計劃而被罰款。監理機關可能會對銀行首席反洗錢官施加哪些後果？（選三）

- A. 失去專業會計和法律稱號
- B. 民事和刑事起訴、罰款和監禁
- C. 禁止在金融服務業就業
- D. 建議與 FI 終止僱傭關係
- E. 加入外國資口管制辦公室特別指定國民和被封鎖人員名單
- F. 禁止處理瓦森納清單上的商品

Answer: (SHOW ANSWER)

Civil and Criminal Prosecution, Fines, and Imprisonment: The Chief AML Officer may face legal action, including both civil and criminal proceedings. This could result in fines and even imprisonment if found guilty of negligence or misconduct related to anti-money laundering compliance.

Ban from Employment: Regulators have the authority to ban individuals from working in the financial services industry if they are deemed unfit due to AML-related failures. Such a ban can significantly impact the individual's career prospects.

Recommend Termination of Employment: While the regulator cannot directly terminate employment, they can recommend that the financial institution (FI) take appropriate action, including termination, based on the Chief AML Officer's performance.

References:

Anti-Money Laundering Specialist (the 6th edition) resources.

ACAMS AML Glossary (definitions of terms related to AML).¹

ACAMS AML Foundations Certificate (overview of AML concepts and responsibilities).²

ComplyAdvantage: 6th Money Laundering Directive (6AMLD) (details on AML regulations and penalties).³

NEW QUESTION: 193

洗錢會為金融機構帶來哪些後果？（選兩個）

- A. 增加公司口
- B. 調口成本和罰款增加
- C. 減少員工數量
- D. 獲利業務的減少或損失
- E. 代理銀行授信額度增加

Answer: (SHOW ANSWER)

Money laundering can have serious consequences for financial institutions. They may face increased investigation costs and fines from regulators and law enforcement agencies for failing to detect or prevent money laundering activities. Additionally, money laundering can result in a loss of profitable business as customers and counterparties may no longer want to do business with the institution due to its reputation for being associated with illicit activity.

Reference: Certified Anti-Money Laundering Specialist (CAMS) Study Guide, 6th Edition, page 76.

NEW QUESTION: 194

金融行動特別工作小組第 29 條建議中所描述的金融情報機構 (FIU) 的核心職能是什麼？

- A. 作為收集和分析可疑活動的國家中心。
- B. 根據國家管轄範圍起訴重大洗錢或恐怖主義融資案件。
- C. 贊助反洗錢調口的先進技術監控工具的研究與發展。
- D. 與私營部門分享從國家執法機構收集的即時犯罪情報。

Answer: A (LEAVE A REPLY)

FIUs act as central hubs for financial crime intelligence, receiving and analyzing Suspicious Activity Reports (SARs) and other data to support law enforcement.

Option A (Correct): FIUs collect, analyze, and disseminate financial intelligence related to money laundering and terrorist financing.

Option B (Incorrect): FIUs do not prosecute cases—they refer cases to law enforcement agencies for prosecution.

Option C (Incorrect): FIUs analyze financial crime data but do not develop surveillance technology.

Option D (Incorrect): FIUs share intelligence with law enforcement and regulatory bodies, not directly with private companies.

Types of FIUs and Their Roles:

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FIU Model	Description	Example
Administrative FIU	Operates under a government agency or central bank.	FinCEN (USA), AUSTRAC (Australia)
Law Enforcement FIU	Operates within a law enforcement body.	UK NCA (UK), IMPA (Israel)
Judicial FIU	Operates within a judicial authority.	Belgium CTIF-CFI

Key FIU Responsibilities:

Collect Suspicious Activity Reports (SARs) from financial institutions.

Analyze financial transactions to identify money laundering patterns.

Disseminate intelligence to law enforcement and regulatory authorities.

Reference:

FATF Recommendation 29 (FIUs and Financial Intelligence Sharing)

Egmont Group Guidelines on FIU Information Sharing

EU Directive on the Role of FIUs in AML/CFT

NEW QUESTION: 195

外國資口管制辦公室的要求具有域外效力，因為以下方面要求遵守：

- A. 在美國的美國人。
- B. 與美國有聯繫的交易的中介機構。
- C. 在美國註冊的實體。
- D. 外國金融情報機構。

Answer: (SHOW ANSWER)

The Office of Foreign Assets Control (OFAC) is the U.S. Treasury Department's agency that administers and enforces economic sanctions programs against countries, groups, and individuals that pose a threat to the national security, foreign policy, or economy of the U.S. OFAC's requirements have an extraterritorial reach because they apply not only to U.S. persons (citizens, permanent residents, entities, and those physically present in the U.S.), but also to any person or entity that engages in a transaction that has a connection to the U.S., such as using the U.S. financial system, U.S. goods, or U.S. persons. This means that intermediaries of a transaction with a U.S. nexus, such as foreign banks, brokers, or agents, are required to comply with OFAC's regulations and may face penalties for violating them. OFAC's jurisdiction does not depend on the registration or incorporation of an entity in the U.S., nor does it extend to foreign financial intelligence units, unless they are involved in a transaction with a U.S. nexus.

References:

The Aggressive Extraterritorial Reach of U.S. Economic Sanctions: Foreign Company Exposure to OFAC Enforcement OFAC Consolidated Frequently Asked Questions The global reach of OFAC sanctions Which three circumstances are U.S. banks required to block transactions?

NEW QUESTION: 196

一家銀行多年來一直為歐洲慈善機構開設帳口。該慈善機構為恐怖分子活躍的各個國家的有需要的人提供衣物。

該慈善機構的哪些行為顯示可能有恐怖主義融資行為？

- A. 慈善機構經常從銀行提取現金
- B. 該慈善機構在多個國家設有分支機構
- C. 該慈善機構主要接收來自歐洲國家的現金捐款
- D. 慈善機構擁有一個銀行帳口，用於支付非業務相關費用

Answer: (SHOW ANSWER)

The charity frequently withdrawing cash from the bank indicates possible terrorist financing, as cash transactions are often used to conceal the source, destination, and purpose of funds. Cash transactions also make it difficult to trace the flow of funds and identify the beneficiaries. Terrorist financiers may use charities as a cover to collect and distribute funds for their activities, and may exploit the cash-based nature of charitable donations to avoid detection¹².

Reference: <https://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Terrorist%20Financing%20Typologies%20Report.pdf>

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NEW QUESTION: 197

下列哪一項敘述關於 2012 年金融行動特別工作小組 (FATF) 的 40 項建議和/或 11 項直接成果是正確的？

- A. 40 項建議的基石是各司法管轄區採用基於風險的方法。
- B. 每個司法管轄區均可聯絡 FATF 以私下取得 40 項建議的解釋性口明。
- C. 這 40 項建議尚未更新以反映新技術的影響。
- D. 11 個直接成果是針對需要加強監控的高風險管轄區提出的建議。

Answer: (SHOW ANSWER)

The FATF 40 Recommendations provide a global AML/CFT framework, and the Immediate Outcomes assess effectiveness.

Option A (Correct): The risk-based approach (RBA) is the foundation of modern AML compliance and is mandated by FATF Recommendation 1.

Option B (Incorrect): Interpretive notes are public documents available to all jurisdictions, not private.

Option C (Incorrect): The 40 Recommendations are regularly updated, incorporating new technology (e.g., virtual assets in 2019).

Option D (Incorrect): The 11 Immediate Outcomes assess the effectiveness of AML systems globally, not just for high-risk countries.

Reference: FATF 40 Recommendations (2012, Updated 2023), FATF Immediate Outcomes, FATF Risk-Based Approach Guidance.

NEW QUESTION: 198

一家金融機構最近購買了反洗錢軟體。由於人員配備有限，該軟體通常會產生超出反洗錢工作人員能正確分析的警報數量。這些警報是由預設軟體規則產生的。負責設定反洗錢軟體參數的個人應該推薦下列哪一項？

- A. 重設軟體參數，降低風險敏感度。
- B. 停用該軟體，直到更多員工接受處理警報的訓練。
- C. 確保警報參數是基於風險。
- D. 調整軟體參數，使警報數量逐漸減少。

Answer: (SHOW ANSWER)

The individual responsible for setting the anti-money laundering software parameters should recommend ensuring that the alert parameters are based on risk, rather than on default software rules. This means that the software should be configured to generate alerts only when transactions or customers exhibit a high level of risk, based on factors such as the source and destination of funds, the amount and frequency of transactions, the type and purpose of the account, the customer profile and behavior, and the presence of any red flags or indicators of money laundering or terrorist financing. By aligning the alert parameters with the risk assessment of the financial institution, the software can reduce the number of false positives and focus on the most relevant and suspicious cases, thus improving the efficiency and effectiveness of the anti-money laundering staff.

Setting AML Transaction Monitoring Thresholds 1, ComplyAdvantage, 2020.

Machine learning techniques for anti-money laundering (AML) analysis: a survey 2, Springer, 2018.

Anti Money Laundering (AML) Definition: Its History and How It Works 3, Investopedia, 2021.

NEW QUESTION: 199

根據巴塞爾銀行監理委員會的口法，下列哪一項敘述最能描述董事會在監督機構反洗錢治理和合規架構中所扮演的角色？

- A. 合規職能部門應直接向執行長報告銀行遵守適用法律、法規和標準的情況，並且僅在需要時向董事會匯報銀行在管理合規風險方面所做的努力。
- B. 合規職能部門必須擁有足口的權力、地位、獨立性和資源，才能獨立發揮作用，且不應進入董事會
- C. 董事會應負責監督銀行合規風險管理，但不應參與制定合規政策，該政策解釋在整個組織口識別和管理合規風險的流程。
- D. 董事會應建立合規職能部門並批准銀行識別、評估、監控、報告和建議合規風險的政策。

Answer: D (LEAVE A REPLY)

The Basel Committee on Banking Supervision (BCBS) sets global standards for bank governance and states that the Board of Directors plays a critical role in AML oversight.

Option D (Correct): The Board is responsible for:

Establishing and approving the AML compliance function.

Ensuring the compliance function has adequate authority and resources.

Overseeing risk management efforts and policies.

Option A (Incorrect): The Board should be actively involved, not just informed when required.

Option B (Incorrect): The compliance function must have direct access to the Board to ensure independent oversight.

Option C (Incorrect): The Board must be involved in policy establishment for effective compliance management.

Why Board Oversight is Critical:

Ensures effective AML governance and accountability.

Reduces regulatory risks and potential financial penalties.

Strengthens financial institution stability and reputation.

Best Practices for Board Oversight in AML Governance:

Establish independent compliance reporting lines to the Board.

Ensure regular AML risk assessments and policy reviews.

Mandate regular AML training for senior management.

Reference:

Basel Committee on Banking Supervision (BCBS) Corporate Governance Principles FATF Recommendation 18 (Internal Controls and Board Oversight) Wolfsberg Group AML Risk Management Framework

NEW QUESTION: 200

網路銀行容易遭受哪三個洗錢階段的攻擊？

- A. 放置
- B. 分層
- C. 集成
- D. 構建

Answer: (SHOW ANSWER)

Online banking is vulnerable to all three stages of money laundering, namely placement, layering, and integration, because it allows the movement of funds across different accounts, jurisdictions, and institutions with speed, anonymity, and convenience. Online banking can facilitate the following money laundering methods:

Placement: The initial stage of money laundering, where illicit funds are introduced into the financial system.

Online banking can enable placement by allowing the deposit of cash or checks through ATMs, mobile devices, or remote deposit capture, or the transfer of funds from prepaid cards, digital wallets, or cryptocurrencies to bank accounts.

Layering: The second stage of money laundering, where illicit funds are moved, disguised, or concealed to obscure their origin and ownership. Online banking can enable layering by allowing the transfer of funds between multiple accounts, often in different jurisdictions or currencies, or the purchase of financial products or services, such as money orders, wire transfers, or online gambling, that create complex transaction trails.

Integration: The final stage of money laundering, where illicit funds are reintroduced into the legitimate economy as apparently legal income or assets. Online banking can enable integration by allowing the transfer of funds to legitimate businesses, investments, or charities, or the purchase of goods or services, such as real estate, luxury items, or travel, that provide a cover for the source of funds.

ACAMS CAMS Certification Video Training Course¹, Module 2: Money Laundering Risks and Methods, Lesson 2.1: The Three Stages of Money Laundering ACAMS CAMS Study Guide, 6th Edition²,

Chapter 2: Money Laundering Risks and Methods, Section 2.1:

The Three Stages of Money Laundering, pp. 29-34

ACAMS CAMS Examination Preparation Seminar, 6th Edition³, Chapter 2: Money Laundering Risks and Methods, Section 2.1: The Three Stages of Money Laundering, Slides 9-13

NEW QUESTION: 201

一位新的客戶代表最近為自稱從事學生輔導工作的個人開設了一個帳戶。

哪些客戶行為顯示可能存在洗錢行為？

- A. 每週持續存入小額現金存款
- B. 另一個定期向親戚擁有的帳戶發起電匯
- C. 大額現金存款當天將所有資金轉移到另一家銀行
- D. 開設儲蓄帳戶並經常從支票帳戶進行轉賬

Answer: (SHOW ANSWER)

This customer action indicates possible money laundering because it could be a sign of layering, which is the second stage of the money laundering process. Layering involves moving the illicit funds around to create distance and confusion between the source and the destination of the money. Transferring all funds to another bank on the same day of large cash deposits could be an attempt to avoid detection by the bank's transaction monitoring system or by the authorities. It could also be a way to break the audit trail and obscure the origin of the funds.

The other customer actions are not necessarily indicative of money laundering, although they could raise some red flags depending on the context and the customer profile. Continually making weekly small cash deposits could be a sign of structuring, which is a technique to avoid reporting requirements by depositing amounts below the threshold. However, this could also be a legitimate behavior for a tutor who receives cash payments from students. Periodically initiating wire transfers to another account owned by a relative could be a sign of funneling, which is a technique to move funds between accounts that are not related to the business or personal activities of the customer. However, this could also be a legitimate behavior for a tutor who supports their family members financially. Opening a savings account and making frequent transfers from the checking account could be a sign of commingling, which is a technique to mix illicit funds with legitimate funds from a legal source. However, this could also be a legitimate behavior for a tutor who wants to save money for future expenses.

CAMS Certification Package - 6th Edition | ACAMS, Chapter 2: Money Laundering Risks and Methods, pp.

35-40

CAMS Certifications: How to Get CAMS Certified | ACAMS, CAMS Study Guide, pp. 28-32 ACAMS CAMS Certification Video Training Course - Exam-Labs, Module 2: Money Laundering Risks and Methods, Video 2.2: The Three Stages of Money Laundering Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 311, Answer C

NEW QUESTION: 202

哪些涉及供應商的情況會為組織帶來更大的反洗錢和/或製裁風險？

- A. 該供應商的銷售代表小時候是來自受制裁管轄區的難民。
- B. 該供應商沒有任何個人擁有或控制該公司 10% 以上的股份。
- C. 該供應商是一家私人控股公司。
- D. 供應商向位於受到經濟制裁的地區的最終用戶提供服務。

Answer: D (LEAVE A REPLY)

Vendors and third-party relationships pose financial crime risks, particularly when they operate in sanctioned jurisdictions. Organizations must ensure that they are not directly or indirectly violating economic sanctions when engaging with vendors.

Option D (Correct): If a vendor provides services to sanctioned entities or individuals, an organization risks violating OFAC, EU, or UN sanctions laws, potentially leading to fines, legal action, or reputational damage.

Engaging in business in a sanctioned region requires strict due diligence and licensing.

Option A (Incorrect): The personal background of an employee is not relevant unless they currently have direct ties to a sanctioned jurisdiction or person.

Option B (Incorrect): A lack of majority ownership does not automatically indicate AML risk; however, organizations should still assess ownership structures for opacity.

Option C (Incorrect): Privately held companies can be transparent if they disclose ownership and operate within compliance standards.

Why This Matters:

Failing to screen vendors for sanctions risks can result in severe penalties, reputational harm, and regulatory scrutiny. OFAC (U.S.), EU, and UN sanctions prohibit business transactions with specific countries, entities, and individuals. Organizations must conduct thorough due diligence to identify and mitigate sanctions risks.

Reference:

OFAC Sanctions Guidelines & Compliance Framework

EU Sanctions Regulations

FATF Recommendation 6 (Targeted Financial Sanctions Related to Terrorism & Proliferation)

NEW QUESTION: 203

哪一項顯示有試圖隱瞞公司真實受益所有權的跡象？

- A. 該公司在另一個司法管轄區設有子公司，且該子公司的實益所有權包括該司法管轄區的當地投資者。
- B. 公司所有權結構的近期變更已在口部記錄並反映在向地方當局提交的文件中。
- C. 公司幾年前成立時的受益所有權資訊與目前的受益所有權資訊不符。
- D. 代表公司填寫申請的人員表明，受益所有人是公司文件中未提及的其他人的提名人。

Answer: (SHOW ANSWER)

A beneficial owner is the natural person who ultimately owns or controls a legal entity or arrangement, such as a company, a trust, or a foundation. Identifying the beneficial owner is essential for preventing and detecting money laundering, terrorist financing, tax evasion, and other illicit activities that may involve the misuse of corporate vehicles. However, some individuals or entities may attempt to conceal the true beneficial ownership of a company by using various techniques, such as complex ownership structures, shell companies, bearer shares, or nominees. A nominee is a person or an entity that acts on behalf of another person or entity, usually for a fee or a commission, without disclosing the identity of the real owner or controller. Nominees can be used to protect or conceal the identity of the beneficial owner and controller of a company or asset. A nominee can help overcome jurisdictional controls on company ownership and circumvent directorship bans imposed by courts and government authorities. While the appointment of nominees is lawful in most countries, the use of nominees for money laundering purposes is illegal and a red flag for suspicious activity. Therefore, the person filling out an application on the company's behalf indicating that a beneficial owner is a nominee for another person

not named in the company's documentation is an indicator that there is an attempt to conceal the company's true beneficial ownership¹².

The other options are not necessarily indicators of concealment of beneficial ownership, as they may have legitimate explanations or reasons. The company having a subsidiary in another jurisdiction with a local investor as a beneficial owner may be a normal business practice or a strategic decision, as long as the ownership information is transparent and accurate. Recent changes to the company's ownership structure may reflect the company's growth, development, or adaptation to market conditions, as long as they are documented and reported to the relevant authorities. Beneficial ownership information from the time that the company was formed several years ago not matching the current information may be due to natural changes in the company's shareholders, directors, or managers, as long as they are updated and verified periodically.

References:

Concealment of Beneficial Ownership - Financial Action Task Force

What's a Beneficial Owner and Why Does it Matter? - Dun & Bradstreet

[ACAMS Study Guide, 6th Edition, Chapter 6, pp. 171-172]

NEW QUESTION: 204

關於反洗錢調口中的資料隱私的哪一種口法最準確？

- A. 金融情報機構 (FIU) 應記錄可疑活動報告(SAR) 中包含的個人資料與其他機構共享的目的
- B. 任何被提交可疑報告的客口都有權要求刪除其個人資料。
- C. 資料隱私法禁止所有司法管轄區的金融機構之間為了反洗錢調口的目的共享資訊。
- D. 組織在向相關金融情報機構 (FIU) 提交 SAR 之前， 必須證明客口已選擇參與資訊共享。

Answer: (SHOW ANSWER)

AML compliance must be balanced with data privacy laws, including GDPR (EU), CCPA (U.S.), and banking secrecy regulations.

Option A (Correct): FIU must document why and how personal data in SARs is shared with law enforcement or regulators.

Option B (Incorrect): SAR subjects cannot request redaction-SARs are confidential to avoid "tipping off" the suspect.

Option C (Incorrect): Many jurisdictions allow AML-related information sharing, particularly under FATF guidance.

Option D (Incorrect): SARs do not require customer consent-they are filed based on legal obligations.

Key Data Privacy Considerations in AML Investigations:

GDPR Article 6 permits data processing for AML compliance.

Banking secrecy laws have exemptions for AML disclosures.

FIUs must document SAR handling procedures for legal compliance.

Best Practices for Managing Data Privacy in AML:

Limit data collection to what is necessary for AML compliance.

Ensure SAR information is only shared with authorized agencies.

Comply with local and international data privacy laws.

Reference:

FATF Recommendation 2 (National Cooperation in AML)
General Data Protection Regulation (GDPR) Compliance for AML
6th EU AML Directive (6AMLD) on SAR Confidentiality

NEW QUESTION: 205

金融機構 (FI) 應何時退出關係？（選兩個）

- A. 關閉帳戶對金融機構造成的聲譽風險
- B. 執法部門要求關閉帳戶
- C. 金融機構開戶的要求
- D. 帳戶持有人的可疑行為
- E. 金融機構規定的關閉帳戶政策和程序

Answer: ([SHOW ANSWER](#))

A financial institution (FI) should exit a relationship when the suspicious conduct of the account holder or the FI's stated policies and procedures for closing an account warrant such action. A FI has the right and responsibility to terminate a customer relationship that poses an unacceptable level of risk to the FI or violates its AML/CFT program. A FI should have clear and consistent criteria for exiting a relationship, such as the number and severity of SARs filed, the nature and extent of due diligence conducted, the availability and effectiveness of mitigating controls, and the alignment of the customer profile with the FI's risk appetite. A FI should also document the rationale and process for exiting a relationship, communicate the decision to the customer and relevant stakeholders, and monitor the account until closure.

The reputational risk to the FI posed by closing the account or the request from law enforcement to close the account are not valid reasons for exiting a relationship by themselves. A FI should consider the potential reputational impact of closing an account, but it should not outweigh the legal and regulatory obligations of the FI to prevent and detect money laundering and terrorist financing. A FI should also cooperate with law enforcement requests, but it should not automatically close an account based on such requests, as they may interfere with ongoing investigations or intelligence gathering. A FI should exercise its own judgment and discretion in deciding whether to exit a relationship, based on its own policies and procedures and the facts and circumstances of each case.

Exiting Relationships: Ten Steps to a Successful Client Exit Strategy

De-risking your SARs: Building SAR relationship exit strategies into your AML/CFT program
Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations

NEW QUESTION: 206

據 PinCEN 報道。當金融機構 (FI) 發現可疑活動並需要提交可疑活動報告 (SAR) 時, SAR 支援文件應 (選擇兩個。)

- A. 有書面的政策和程序來維護支援文件。
- B. 保存在單獨的文件中, 並將硬拷貝存放在防火櫃中。
- C. 始終僅限於帳戶名稱、帳戶詳細資料和交易記錄。

D. 包含幫助 FI 確定該活動需要備案的所有文件或記錄。

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 207

哪些涉及供應商的情況會為組織帶來更大的反洗錢和/或製裁風險？

- A. 該供應商的銷售代表小時候是來自受制裁管轄區的難民。
- B. 該供應商沒有任何個人擁有或控制該公司 10% 以上的股份。
- C. 該供應商是一家私人控股公司。
- D. 供應商向位於受到經濟制裁的地區的最終用戶提供服務。

Answer: ([SHOW ANSWER](#))

Businesses must not engage with entities in sanctioned jurisdictions without proper licensing.

* Option D (Correct): Providing services to sanctioned areas exposes an organization to OFAC or EU penalties.

* Option A (Incorrect): Personal history does not necessarily indicate AML risk.

* Option B (Incorrect): Lack of individual ownership above 10% does not inherently indicate risk.

* Option C (Incorrect): Private ownership alone does not pose an AML concern.

Reference: OFAC Sanctions Compliance, EU Sanctions Regulations, Wolfsberg Group Vendor Risk Management Guidance.

NEW QUESTION: 208

哪一筆交易應導致提交可疑活動報告？

- A. 一位小企業主每天在沒有提供合法目的的情況下存入總計 9,950 美元的支票。
- B. 小企業主透過商業設備銷售單存入 25,000 美元的現金收益。
- C. 一家全國性食品連鎖餐廳進行了多次超出每日報告門檻的預期現金交易。
- D. 全國性食品連鎖餐廳，在多家分店進行多次現金交易。

Answer: ([SHOW ANSWER](#))

According to the Certified Anti-Money Laundering Specialist (the 6th edition), Section 2.2.5 Suspicious Activity Reporting (SAR) Requirements, a Suspicious Activity Report (SAR) filing is required when a financial institution is aware of, or suspects, a possible violation of law or regulation, or any other suspicious activity related to money laundering, terrorist financing, or other unlawful activity. In this case, Answer A would require a Suspicious Activity Report filing as the deposits are made on a daily basis without providing a legitimate purpose.

According to the Financial Crimes Enforcement Network's (FinCEN) guidance, one example of a suspicious transaction is "frequent deposits of cash or monetary instruments in amounts under \$10,000 to the same account, or a pattern of such deposits, unless the financial institution has a reasonable explanation for the pattern." (CAMS Manual, 6th Edition, Page 209)

NEW QUESTION: 209

根據沃爾夫斯堡私人銀行原則，哪三種情況是定義客戶需要額外盡職調查的指標？選出 3 個答案

- A. 居住在擁有來自反洗錢標準不足的國家/地區的資金的人

- B. 從事已知易受洗錢影響的商業活動的人員
- C. 透過代理銀行關係接收資金的人員
- D. 被認定為政治公眾人物 (PEP) 的人員

Answer: (SHOW ANSWER)

According to the Wolfsberg Principles on Private Banking, the bank should apply additional diligence to customers who present a higher risk of money laundering or other financial crimes. Some of the indicators for defining such customers are:

Persons residing in or having funds from countries with inadequate AML standards, sanctions, embargoes, or other measures that indicate a higher risk of money laundering or terrorist financing¹².

Persons engaged in business activities known to be susceptible to money laundering, such as cash-intensive businesses, gambling, arms trade, precious metals and stones, art and antiquities, etc¹³.

Persons determined to be Politically Exposed Persons (PEPs), who are individuals who hold or have held positions of public trust or influence, or their family members or close associates, and who may pose a higher risk of corruption, bribery, or abuse of power¹⁴.

Persons who receive funds from a correspondent banking relationship are not necessarily required additional diligence, unless they fall under any of the above categories or other risk factors.

Correspondent banking is a service provided by one bank to another bank to facilitate cross-border transactions, and it is subject to its own set of AML standards and due diligence measures⁵.

Wolfsberg Anti-Money Laundering Principles for Private Banking (2012) 1 FATF High-Risk and Other Monitored Jurisdictions FATF Money Laundering and Terrorist Financing Vulnerabilities of Legal Professionals FATF Guidance on Politically Exposed Persons (Recommendations 12 and 22) FATF Guidance on Correspondent Banking Services

NEW QUESTION: 210

機構在建立可疑交易審核和可疑交易記錄填寫程序時應重點關注哪些問題？

- A. 需要針對機構可能遇到的潛在危險訊號進行持續培訓
- B. 對可疑交易進行集中審口的適當性以及提交 STR 以確保一致性的建議
- C. 用於追蹤 STR 並確保隔離和維護適當的支援文件的系統
- D. 在填寫 STR 之前無需確保機構有明顯的不當行為

Answer: (SHOW ANSWER)

An institution should focus on the appropriateness of having a centralized review of suspicious transactions and recommendations to file an STR to ensure consistency. This is because a centralized review process can help to avoid duplication, inconsistency, or omission of STRs, as well as to ensure compliance with regulatory requirements and internal policies. A centralized review process can also facilitate the analysis of trends, patterns, and typologies of suspicious transactions across the institution, and enable the communication and coordination with relevant stakeholders, such as law enforcement, regulators, or other financial institutions.

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ACAMS Study Guide for the CAMS Certification Examination, 6th Edition, Chapter 5, Section 5.3.1, page 1911

NEW QUESTION: 211

根據《美國愛國者法案》，美國可能採取什麼行動來展示域外影響力？

- A. 向非美國金融機構 (FI) 發送訊息請求
- B. 將美國的潛在處罰移交給另一個政府
- C. 凍結包含非美國金融機構資金的美國帳戶
- D. 在非美國金融機構所在國提起訴訟

Answer: (SHOW ANSWER)

Based on the USA PATRIOT Act, one action that the US might take to demonstrate extraterritorial reach is to send requests for information to a non-US based financial institution (FI). The USA PATRIOT Act expanded the authority of the US government to issue subpoenas and other legal orders to foreign banks that maintain a correspondent account in the US, requiring them to produce records relating to such account or any account at the foreign bank, including records maintained outside the US¹². This provision was intended to enhance the ability of the US to investigate and prosecute money laundering and terrorist financing activities that involve foreign FIs³.

1: USA PATRIOT Act, Section 319(b)

2: Britannica, USA PATRIOT Act, History & Society

3: Princeton Legal Journal, FISA and the USA PATRIOT Act: Reforms and Legal Implications

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NEW QUESTION: 212

一家銀行為外國金融機構開設多個美元代理帳戶。對外國銀行 A 擁有的美元代理帳戶進行例行審閱後發現，許多交易似乎是由外國銀行 B 發起的，超出了該帳戶的預期活動。這些交易顯得可疑，合規官已提交可疑交易報告。

合規官應該採取哪個步驟？

- A. 向外國銀行 A 和外國銀行 B 所在司法管轄區的相應監管機關提交報告
- B. 透過允許外國銀行 A 維持其洗錢風險，向高階管理層通報洗錢風險
- C. 關閉美元代理帳戶
- D. 將此發現通知外國銀行 A，並尋求支持外國銀行 A 與外國銀行 B 共謀並願意在該活動中合作的文件
- E. 通知為外國銀行 A 和外國銀行 B 持有美元代理帳戶的其他美國金融機構，以停止活動

Answer: (SHOW ANSWER)

According to the FFIEC BSA/AML Manual¹, a U.S. bank should have policies, procedures, and processes to monitor and report suspicious activity associated with U.S. dollar drafts, which are bank drafts or checks denominated in U.S. dollars and made available at foreign financial institutions. These drafts are drawn on a U.S. correspondent account by a foreign financial institution and can be used to facilitate money laundering or terrorist financing. The manual states that "[t]he potential for facilitating money laundering or terrorist financing, OFAC violations, and other serious crimes increases when a U.S. bank is unable to identify and adequately understand the transactions of the ultimate users (all or most of whom are outside of the United States) of its account with a foreign correspondent."²

Therefore, the compliance officer should notify Foreign Bank A of the discovery and seek documentation supporting Foreign Bank A was collusive and a willing partner with Foreign Bank B in the activity, as this would indicate a breach of the correspondent banking agreement and a possible violation of U.S. laws and regulations. The compliance officer should also document the findings and actions taken, and escalate the matter to senior management and the board of directors as appropriate. The other options are not the best steps for the compliance officer to take. Option A is not relevant, as the issue is not related to tax evasion, but to money laundering or terrorist financing. Option B is premature, as the compliance officer should first verify the nature and extent of the suspicious activity and the involvement of Foreign Bank A before deciding whether to terminate or restrict the correspondent relationship. Option D is not feasible, as the compliance officer does not have the authority or the means to notify other U.S. financial institutions who maintain U.S. dollar correspondent accounts for Foreign Bank A and Foreign Bank B, and this could also interfere with ongoing investigations or law enforcement actions.

FFIEC BSA/AML Manual, Risks Associated with Money Laundering and Terrorist Financing, U.S. Dollar Drafts Denting Dirty Dollar-Clearing: US Court of Appeals Upholds Money-Laundering Convictions Based on the Use of US Correspondent Banking Accounts, Freshfields Blog AMLA Expands DOJ Grand Jury Subpoena Power Over Correspondent Bank Accounts and Foreign Banks, Money Laundering News

NEW QUESTION: 213

與房地口交易相關的風險包括（選擇兩個）

- A. 跨境購買。
- B. 以自然人之名購買。
- C. 支付房口的真實市場價格。
- D. 非融資購買。

Answer: A,D (LEAVE A REPLY)

Real estate transactions are vulnerable to ML/TF risks, particularly when there is limited transparency or unusual payment methods:

* Cross-border purchases (A): "Purchases by foreign buyers, especially from high-risk jurisdictions, are a red flag for money laundering in the real estate sector." (CAMS 6th Edition, Real Estate Money Laundering Risks; FATF, Money Laundering and Terrorist Financing through the Real Estate Sector, 2007)

* Non-financed purchases (D): "Non-financed (all-cash) purchases can indicate the introduction of illicit funds into the financial system, bypassing the controls of mortgage lenders." (CAMS 6th Edition, Real Estate ML/TF Risks) Incorrect Options:

* B: Purchasing in the name of a natural person is standard and not inherently risky.

* C: Paying the true market price does not raise ML/TF risk.

References:

CAMS 6th Edition, Chapter: ML/TF Risks in Real Estate

FATF, Money Laundering and Terrorist Financing through the Real Estate Sector (2007)

NEW QUESTION: 214

銀行 A 位於 A 國。來自位於 B 國的銀行 B 的電匯由銀行 A 處理，資金將轉至位於 C 國的銀行 C 的客口。銀行 A 認為該電匯可疑。

A. A 國的交易。

B. A 國的 B 銀行。

C. B 國的交易。

D. C 國的 C 銀行。

Answer: (SHOW ANSWER)

According to the BSA/AML Manual¹, a financial institution is required to file a SAR for any transaction conducted or attempted by, at, or through the institution that involves or aggregates at least \$5,000 in funds or other assets, and the institution knows, suspects, or has reason to suspect that the transaction (or a pattern of transactions of which the transaction is a part): (a) involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity; (b) is designed to evade any requirements of the BSA or its implementing regulations; has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the institution knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction; or (d) involves use of the institution to facilitate criminal activity. In this case, Bank A is the institution that processes the wire transfer and deems it suspicious, based on its own assessment of the transaction and the customer. Therefore, Bank A is responsible for filing a SAR for the transaction in Country A, where it is located and where the transaction takes place. Bank A does not need to file a SAR for the transaction in Country B or Country C, as it does not have jurisdiction or authority over those countries or the other banks involved. However, Bank A may share information about the suspicious transaction with Bank B or Bank C, subject to certain conditions and limitations, as described in the BSA/AML Manual¹.

BSA/AML Manual¹

Suspicious Activity Reporting - Overview²

Suspicious Activity Report (SAR) Basics³

From Microsoft Start Partners

Another simpler way of looking at the problem is by seeing this case as a Correspondent Banking relationship:

-A is the primary correspondent bank.

-B is the respondent bank.

-C is the receiving bank (of the wire transfer).

Since A is conducting the transaction on behalf of B's customer via the correspondent relationship deemed suspicious, it is the transaction in Country A by the correspondent bank that files the STR. Also, per the regular process, it is on the transaction, not the bank, that the STR is filed against.

NEW QUESTION: 215

在提交可疑交易報告時，在決定是否保留帳戶時，下列哪個要素應成為反洗錢的最高優先事項？

A. 如果關閉帳戶，對機構的財務影響

B. 確定組織潛在風險的程序。

C. 監控帳戶的額外管理成本。

D. 該機構上個月關閉的帳戶總數。

Answer: B (LEAVE A REPLY)

According to the CAMS Certification Package - 6th Edition¹, the decision to keep or close an account after filing a suspicious transaction report (STR) should be based on a risk-based approach that considers the nature and severity of the suspicious activity, the customer profile and relationship, the regulatory and legal obligations, and the reputational and operational risks for the institution. The financial impact, the administrative costs, and the number of accounts closed are not the primary factors in determining the appropriate course of action. Therefore, the correct answer is B. Procedures to ascertain the potential risk to the organization.

CAMS Certification Package - 6th Edition¹, Chapter 5: Risk Management, Section: Account Closure, pp. 211-212.

NEW QUESTION: 216

銀行外國資戶管制辦公室制裁篩選審核計畫應包含哪些測試？

A. 檢視電匯篩選流程，以確保及時調戶潛在的名字命中

B. 戶看向監管機構提交的可疑活動報告副本，以確保完整性

C. 確保所有具有外國身分的顧客都受到強化的盡職調戶

D. 檢視對高階主管進行犯罪背景調戶的人力資源流程

Answer: (SHOW ANSWER)

---Wire transfers are one of the most common methods of moving funds across borders and jurisdictions, and therefore pose a high risk of violating OFAC sanctions. A bank's OFAC sanctions screening audit program should include a test to review the wire transfer screening processes to ensure that potential name hits are investigated promptly and appropriately, and that any blocked or rejected transactions are reported to OFAC in a timely manner. This test would help the bank to assess the effectiveness of its screening system, identify any gaps or weaknesses, and demonstrate its compliance with OFAC regulations.

A Framework for OFAC Compliance Commitments¹, page 4, section 4: Testing and Auditing OFAC
Framework for Sanctions Compliance Programs², page 2, section 4: Testing and Auditing OFAC
Sanctions List Search Tool³

NEW QUESTION: 217

《美國愛國者法案》的哪些面向對外國金融機構產生影響？

- A. 要求加強對外國空殼銀行的盡職調查
- B. 將制裁要求擴大至美國金融機構的海外分支機構
- C. 將反洗錢計畫要求擴大到所有外國金融機構
- D. 授權對主要涉及洗錢的機構實施特殊措施

Answer: (SHOW ANSWER)

Section 311 of the USA PATRIOT Act grants the Secretary of the Treasury the authority to designate foreign jurisdictions, financial institutions, classes of transactions, or types of accounts as being of primary money laundering concern, and to impose one or more of five special measures on them. These special measures range from requiring enhanced recordkeeping and reporting to prohibiting U.S. financial institutions from opening or maintaining correspondent accounts for the designated entities. The purpose of these special measures is to protect the U.S. financial system from money laundering and terrorist financing risks posed by the designated entities.

USA PATRIOT Act | FinCEN.gov

FACT SHEET for Section 312 of the USA PATRIOT Act Final Regulation and Notice of Proposed Rulemaking | FinCEN.gov International Financial Crime: Treasury's Roles and Responsibilities Should Be Updated - GovInfo Reference:<https://www.imf.org/external/np/leg/sem/2002/cdmfl/eng/tompki.pdf>(8)

NEW QUESTION: 218

金融機構 (FI) 進行企業範圍的反洗錢風險評估的關鍵原因是什麼？

- A. 需要評估洗錢和恐怖主義融資風險並確保有足夠的控制措施來減輕這些風險。
- B. 辨識銀行獨有的特定風險類別（即出口不活動、外行人和虛假位置）。
- C. 需要了解每個部門和內部稽核的整體預算需求。
- D. 董事會和高階管理層必須對銀行進行反洗錢風險評估。

Answer: (SHOW ANSWER)

A key reason why a FI conducts an enterprise-wide AML risk assessment is to assess money laundering and terrorist financing risks and ensure there are adequate controls to mitigate those risks. An enterprise-wide AML risk assessment allows the FI to identify and appropriately manage the ML/TF and other illicit financial activity risks within its banking operations. It also helps the FI to establish global AML control standards and determine the effectiveness of its AML risk management program, including internal preventive and detective controls. By understanding its risk profile, the FI can better apply appropriate risk management processes to the BSA/AML compliance program to mitigate and manage risk and comply with BSA regulatory requirements. The BSA/AML risk assessment should provide a comprehensive analysis of the FI's ML/TF and other illicit financial activity risks, and should be documented in writing and communicated to all relevant stakeholders.

- 1: Enterprise Wide AML, CTF, Sanctions Risk Assessment (EWRA ... - Eloquens2
- 3: BSA/AML Risk Assessment - FFIEC BSA/AML3
- 2: ACAMS Study Guide for the CAMS Certification Examination2

NEW QUESTION: 219

執法機構正在審閱金融機構提交的可疑交易報告 (STR)，以確定客戶帳戶上是否有可疑活動。隨後，該機構要求提供更多資訊。

執法機構可能會要求該機構提供哪些支持文件以促進其調查？

- A. 先前針對同一客戶提交的 STR
- B. 開戶文件和帳戶對帳單
- C. 發送給客戶的促銷資料副本
- D. 機構 STR 政策和程序的副本

Answer: (SHOW ANSWER)

A law enforcement agency may request account opening documents and account statements from the institution to facilitate its investigation of a suspicious transaction report (STR). These documents can provide valuable information about the identity, background, source of funds, and transaction patterns of the customer, as well as any red flags or anomalies that may indicate money laundering or other criminal activities. Account opening documents may include identification documents, verification documents, customer due diligence forms, risk assessment forms, etc. Account statements may include transaction details, balances, fees, charges, etc.

ACAMS, CAMS Examination Study Guide, 6th Edition, Chapter 4, pp. 115-116 FATF Guidance: The Role of Hawala and Other Similar Service Providers in Money Laundering and Terrorist Financing, October 2013, p. 20 Basel Committee on Banking Supervision, Sound management of risks related to money laundering and financing of terrorism, June 2017, p. 11

NEW QUESTION: 220

在根據內部調查獨立決定是否關閉帳戶時，金融機構 (FI) 應考慮。(選擇五個。)

- A. 關閉帳戶的法律依據。
- B. 潛在行為的嚴重性。
- C. 帳戶活動的頻率
- D. 與執法部門的通信
- E. 客戶的個人關係。
- F. 聲譽風險。
- G. FI 的政策和程序。

Answer: (SHOW ANSWER)

NEW QUESTION: 221

當金融機構 (FI) 收到有關客戶的大陪審團傳票時，應採取哪些行動？

- A. 讓該機構指定的法律顧問審閱傳票。
- B. 影印客戶的文件並將原件提交給執法機關。

C. 依照執法機關的口頭要求保持客戶的帳戶開放。

D. 提交文件前通知被調查的客戶。

Answer: (SHOW ANSWER)

FIs must handle law enforcement subpoenas carefully to comply with legal and AML obligations.

Option A (Correct): Legal counsel must review subpoenas to ensure compliance with AML and privacy laws.

Option B (Incorrect): Original documents should only be provided under specific legal conditions.

Option C (Incorrect): Account closure decisions must follow AML risk-based assessment.

Option D (Incorrect): Tipping off a customer about an investigation is illegal under AML laws.

Reference: FinCEN Subpoena Compliance Guidelines, U.S. Bank Secrecy Act (BSA) Subpoena Rules, FATF Recommendation 40 (International Cooperation).

NEW QUESTION: 222

哪種活動最有可能透過控制不充分的網路銀行系統促進洗錢？

A. 進行大量交易

B. 提供持續的全球訪問

C. 進行匿名交易

D. 進行大額交易

Answer: (SHOW ANSWER)

Conducting anonymous transactions is the most likely activity to facilitate money laundering through online banking systems with inadequate controls. Anonymous transactions allow money launderers to hide their identity, source and destination of funds, and the purpose of their transactions from the authorities and the financial institutions. Online banking systems that do not have proper KYC, customer due diligence, and transaction monitoring controls are vulnerable to being exploited by money launderers who can use various techniques, such as encryption, proxy servers, virtual currencies, prepaid cards, and online gambling, to conduct anonymous transactions¹²³.

ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 2, page 40-41, 43-44 ACAMS CAMS Certification Video Training Course, Module 2, Lesson 2.4, Money Laundering Using New Payment Methods

1, Fighting money laundering in the age of online banking, virtual currencies and internet gambling | ERA Forum

2, Financial crime risk management in digital payments | McKinsey

3, The Relationship Between Digital Banking and Financial Crime

NEW QUESTION: 223

銀行收到一筆電匯，其中涉及向受制裁公司出售設備。該銀行的營運團隊刪除了受制裁的公司參考訊息，並允許處理電匯。這是對什麼類型活動的描述？

A. 掉頭付款

B. 涵蓋付款濫用

C. 分層

D. 剝線

Answer: (SHOW ANSWER)

Wire stripping is the process of removing or altering the identifying information associated with a wire transfer to make it difficult to trace the origin or destination of the funds. This technique is commonly used in money laundering schemes to conceal the illicit source of funds and avoid detection by authorities or sanctions screening systems. In this case, the bank's operations team deliberately removed the reference to the sanctioned company from the wire transfer message, thus violating the FinCEN "Travel Rule" and facilitating the evasion of sanctions.

Wire Stripping in Anti Money Laundering Parlance

Wire Transfer Red Flags: Understanding Money Laundering and Fraud Risks Wire Stripping

NEW QUESTION: 224

當一國政府對某一目標實施經濟制裁時，其目的是：

- A. 表示除非目標符合政府的利益，否則可能會使用軍事力量。
- B. 鼓勵非政府組織 (NGO) 增加向目標國家提供人道和慈善援助。
- C. 保護目標國家公民免受本國政府侵害的權利，並改善該地區的金融穩定。
- D. 改變國家或非國家目標的行為，威脅該政府的利益或違反國際規範。

Answer: D (LEAVE A REPLY)

Economic sanctions are used as a non-military tool to enforce foreign policy and national security objectives.

Option D (Correct): Sanctions aim to change the behavior of entities engaged in money laundering, terrorist financing, or other illicit activities.

Option A (Incorrect): Sanctions do not necessarily indicate military action.

Option B (Incorrect): NGOs may be exempt from sanctions, but this is not their primary purpose.

Option C (Incorrect): While human rights concerns can lead to sanctions, they are primarily imposed to change behavior.

Reference: OFAC Sanctions Guidance, UN Security Council Sanctions List, EU Sanctions Regulations.

NEW QUESTION: 225

一個沒有強大上游犯罪且起訴反洗錢案件不嚴格的國家可能會遭受哪些社會/經濟後果？

- A. 美國制裁
- B. 口收損失
- C. 組織犯罪和腐敗增加
- D. 港口聲譽風險

Answer: (SHOW ANSWER)

Predicate offenses are the criminal activities that generate the proceeds that are later laundered through money laundering schemes. A country that does not have strong predicate offenses and is lax in prosecuting AML cases could suffer from increased organized crime and corruption, as criminals would have more opportunities and incentives to engage in illicit activities and evade detection and punishment. Organized crime and corruption can have serious social and economic consequences for

a country, such as undermining the rule of law, eroding public trust, threatening national security, harming human rights, reducing economic growth, and distorting market competition¹²³.

References:

CAMS Certification Package - 6th Edition | ACAMS

Understanding Predicate Offences: The Hidden Web of Money Laundering

Predicate Offenses In Money Laundering - Financial Crime Academy

AML Terms Easily Confused: Predicate Offense vs. Money Laundering

NEW QUESTION: 226

一家金融機構正在設計企業範圍風險評估 (EWRA)。

根據沃爾夫斯堡集團基於風險的反洗錢方法，有效的EWRA 應該：

- A. 使用由第三方供應商提供並由轄區其他金融機構使用的架構。
- B. 包括適當的措施和控制措施，以減輕來自高風險客戶、產品和地區的洗錢風險。
- C. 重點了解評估期間新客戶所帶來的風險以及減輕相關洗錢風險的控制措施。
- D. 關注金融機構產品和服務中固有的風險以及減輕潛在洗錢風險的控制措施。

Answer: B (LEAVE A REPLY)

An Enterprise-Wide Risk Assessment (EWRA) helps financial institutions identify and mitigate money laundering risks.

Option B (Correct): Wolfsberg Group and FATF emphasize that an EWRA should focus on higher-risk customers, products, and geographies, ensuring appropriate controls are in place.

Option A (Incorrect): Institutions should not blindly adopt third-party frameworks without customizing them to their specific risk exposure.

Option C (Incorrect): While new clients are important, an EWRA must assess risks across all customers and transactions.

Option D (Incorrect): EWRA must address residual risk, not just inherent risk. Effective mitigation strategies are essential.

Reference: Wolfsberg Group Guidance on Risk-Based Approach (2019), FATF Recommendation 1 (Risk-Based Approach), Basel Committee's AML/CFT Principles.

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NEW QUESTION: 227

根據沃爾夫斯堡集團關於制止資助恐怖主義的聲明，尋求修改機構反恐融資工作的合規官員應包括哪三個程序？

- A. 適用的清單並採取適當的措施來確定客戶是否出現在此類清單中
- B. 向有關當局報告已知或可疑恐怖分子名單中的匹配項
- C. 維護客戶訊息，以便及時檢索此類信息
- D. 驗證客戶時僅檢閱原始身分證明文件

Answer: (SHOW ANSWER)

According to the Wolfsberg Group's Statement on the Suppression of the Financing of Terrorism¹, a compliance officer should include the following three procedures in revising an institution's CTF efforts: Consulting applicable lists and taking appropriate actions to determine if customers appear on such lists. This procedure is important to prevent terrorist organizations from accessing the financial services of the institution and to comply with the sanctions and regulations imposed by competent authorities. The compliance officer should implement procedures for checking the customers against the lists of known or suspected terrorists or terrorist organizations issued by relevant authorities and taking reasonable and practicable steps to verify the identity and status of the customers.

Reporting matches from lists of known or suspected terrorists to relevant authorities. This procedure is important to assist the authorities in their efforts to detect and disrupt terrorist financing and to fulfill the legal obligations of the institution. The compliance officer should report to the relevant authorities any matches from the lists of known or suspected terrorists or terrorist organizations consistent with the applicable laws and regulations regarding the disclosure of customer information.

Maintaining customer information to facilitate timely retrieval of such information. This procedure is important to enable the institution to respond promptly and effectively to the enquiries and requests from the authorities and to enhance the quality and accuracy of the customer data. The compliance officer should explore ways of improving the maintenance of customer information to facilitate the timely retrieval of such information.

Wolfsberg Statement on Anti-Terrorism Financing

UNUSUAL CUSTOMER IDENTIFICATION CIRCUMSTANCES

* Customer furnishes unusual or suspicious identification documents or declines to produce originals for verification."

NEW QUESTION: 228

金融行動特別工作小組區域型機構的目標是什麼？

- A. 執行健全的 AML 流程以回應建議
- B. 分析犯罪分子或恐怖分子濫用其所在地區金融體系的新方法或正在開發的方法
- C. 制定標準來評估成員是否有適當的反洗錢制度
- D. 執行當地反洗錢法規

Answer: (SHOW ANSWER)

NEW QUESTION: 229

維護最新制裁資訊的兩個來源是什麼？（選兩個）

- A. 美國聯邦調查局的國家安全信件
- B. 美國財政部外國資管制辦公室
- C. 美國財政部 - 第 311 條 - 特別措施

D. 金融行動特別工作小組的高風險和不合作司法管轄區列表

Answer: (SHOW ANSWER)

The U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. OFAC publishes lists of individuals and entities that are subject to various sanctions programs, such as the Specially Designated Nationals and Blocked Persons List (SDN List), the Sectoral Sanctions Identifications List (SSI List), and the Foreign Sanctions Evaders List (FSE List). These lists are updated frequently and can be accessed through OFAC's website or other sources¹².

The Financial Action Task Force (FATF) is an inter-governmental body that sets standards and promotes effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. FATF publishes lists of jurisdictions that have strategic deficiencies in their anti-money laundering and counter-terrorist financing (AML/CTF) regimes, and calls on its members and other countries to apply enhanced due diligence or counter-measures to protect themselves from the risks emanating from these jurisdictions. These lists are updated periodically and can be accessed through FATF's website or other sources³⁴.

1:

CAMS Certification Package - 6th Edition | ACAMS, Chapter 3: Sanctions, p. 63-64

2: U.S. Department of the Treasury Office of Foreign Assets Control, <https://home.treasury.gov/policy-issues/financial-sanctions>

3: CAMS Certification Package - 6th Edition | ACAMS, Chapter 4: FATF Recommendations, p. 77-78

4: Financial Action Task Force, <http://www.fatf-gafi.org/countries/#high-risk>

Reference: https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_lists.aspx#search

NEW QUESTION: 230

一家金融機構的合規官已完成對高風險客戶活動的調查，並確定洗錢的強烈跡象。合規官已記錄了他們的發現並準備建議客戶下架。

然而，負責該客戶的客戶經理反對這個想法，理由是該客戶對該機構的收入貢獻巨大。

合規官下一步該做什麼來確保遵循適當的升級和決策流程？

- A. 將問題上報給機構的高風險客戶委員會，提交調查結果並建議下架，同時承認客戶關係經理的擔憂
- B. 根據調查結果和反洗錢 (AML) 擔憂，單方面終止與客戶的合作關係
- C. 試著透過強調與維持關係相關的潛在聲譽和監管風險來口服關係經理同意離職建議
- D. 延遲離職決定並繼續監控客戶的活動，等待進一步的證據來鞏固終止的理由

Answer: (SHOW ANSWER)

In situations involving significant AML concerns, especially with high-risk clients, the compliance officer must follow proper escalation procedures within the institution. The appropriate course of action is to escalate the matter to a senior governance body, such as a high-risk client committee, which is typically tasked with balancing AML risk against business considerations.

Unilateral offboarding (Option B) may violate internal protocols.

Persuading the relationship manager (Option C) bypasses formal governance.

Delaying action (Option D) risks further exposure to regulatory or reputational damage.

This escalation ensures documented risk-based decision-making and demonstrates to regulators that the institution applies structured and objective AML governance.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Compliance Governance and Risk Escalation Processes- Section: Governance Structures for High-Risk Customers

NEW QUESTION: 231

銀行收到傳票請求（或已受到監控數月的客戶）。銀行希望關閉該帳戶以減輕任何額外風險。但是，政府要求該帳戶保持開放狀態。什麼必須向銀行提供文件以保持帳戶開放嗎？

- A. 政府與金融機構之間保持帳戶開放的電子郵件協議
- B. 帶有正確抬頭並獲得政府授權的書面請求
- C. 保持帳戶開放但資金凍結的命令
- D. 董事會授權

Answer: (SHOW ANSWER)

If a financial institution wishes to close an account due to concerns about potential money laundering or other financial crimes, it is generally required to file a suspicious activity report (SAR) with the appropriate government agency. However, there may be instances where the government requires the account to remain open for ongoing investigation purposes.

In such cases, the government must provide a written request under proper letterhead and authority to keep the account open. This document will serve as legal justification for the financial institution to maintain the account, even though it may pose a higher risk for money laundering or other financial crimes.

NEW QUESTION: 232

哪些是可能透過線上賭博洗錢的危險信號？（選兩個）

- A. 該玩家被認定為政治公眾人物 (PEP)。
- B. 玩家使用不同的IP位址以相同名稱開立多個帳戶。
- C. 客戶使用信用卡為線上賭博帳戶注資。
- D. 玩家將少量資金存入其線上賭博帳戶。
- E. 客戶從多個國家登入帳戶。

Answer: (SHOW ANSWER)

According to the research report by the Council of Europe¹, one of the typologies of money laundering through online gambling is the use of multiple accounts and identities to conceal the source and destination of funds. This can be done by opening several accounts under the same name using different IP addresses, or by using false or stolen identification documents to create multiple accounts. Another typology is the use of online gambling platforms that are not regulated or authorized by the jurisdiction where the customer is located, or that do not require know-your-client information from users. This can allow money launderers to access the online gambling services from multiple countries, without being subject to any verification or monitoring by the authorities.

1: Research report - The use of online gambling for money laundering and the financing of terrorism purposes, Council of Europe, April 2013.

NEW QUESTION: 233

下列哪一項最精確地描述了巴塞爾銀行監理委員會關於客戶盡職調查的原則？

- A. 所有成員之間的多邊協定。
- B. 對會員和銀行的建議。
- C. 大型國際銀行所發布的普遍接受的條款。
- D. 一個國家為提高其金融市場聲譽所採取的措施。

Answer: (SHOW ANSWER)

The Basel Committee on Banking Supervision (BCBS) is a global standard-setting body for the prudential regulation of banks. It does not have any formal authority to enforce its standards, but relies on its members' commitment and peer pressure to implement them. The BCBS's principles on customer due diligence (CDD) are part of its guidelines on anti-money laundering and combating the financing of terrorism (AML/CFT), which aim to enhance the soundness and integrity of banking systems. The BCBS's principles on CDD provide guidance to banks and bank supervisors on the essential elements of a CDD programme, such as customer acceptance, identification, verification, risk assessment, monitoring, and record-keeping. The BCBS's principles on CDD are not legally binding, but are intended to be a benchmark for national practices and for banks to design their own policies and procedures. The BCBS's principles on CDD are consistent with the recommendations of the Financial Action Task Force (FATF), the global standard-setter for AML/CFT.

Customer due diligence for banks 1, BCBS, October 2001.

The Basel Committee on Banking Supervision report on customer due diligence 2, Journal of Banking Regulation, 2002.

NEW QUESTION: 234

一家銀行正在為監管考試做準備，先前的監管考試發現了其反洗錢計畫中存在缺陷。自上次考試以來，該銀行已：

改進了書面反洗錢程序

聘請了一位經驗豐富的反洗錢合規官

展現出更強的合規文化

專注於清理交易監控案件積壓並加強制裁篩檢計畫。下列哪一項是正確的？（選兩個）

- A. 儘管該銀行解決了許多先前的問題，但仍有可能面臨全球金融機構的二級制裁。
- B. 由於監管命令必須保密，因此銀行不會受到任何監管行動引起的聲譽風險的影響。
- C. 儘管該銀行解決了許多先前的問題，但仍可能面臨監管機構要求其糾正反洗錢計畫的風險。
- D. 如果銀行無法證明在解決先前的問題上取得持續進步，可能會面臨民事或刑事處罰。
- E. 監理機關可能會要求銀行董事會公開分享為解決先前問題而採取的行動，以限制其聲譽風險。

Answer: (SHOW ANSWER)

Regulatory exams assess whether financial institutions comply with AML/CFT laws and have adequately addressed previous deficiencies.

* Option C (Correct): Regulators may still issue remediation orders if the bank's improvements do not fully resolve prior AML compliance gaps.

* Option D (Correct): If deficiencies persist, regulators may impose civil or criminal penalties.

Why Other Options Are Incorrect:

* Option A (Incorrect): Secondary sanctions typically apply to institutions violating international sanctions laws, not AML program deficiencies.

* Option B (Incorrect): Regulatory orders are not always confidential-major enforcement actions may be publicly disclosed.

* Option E (Incorrect): Boards are responsible for AML oversight but are not always required to disclose corrective actions publicly.

Best Practices for Addressing AML Exam Findings:

* Document all remediation efforts with clear implementation timelines.

* Demonstrate a culture of compliance through leadership and training.

* Ensure sustained improvements, not just short-term fixes.

Reference:

FATF Recommendation 18 (AML Compliance & Internal Controls)

Basel Committee's Guidelines on Regulatory Compliance in AML

OCC and FinCEN Enforcement Actions on AML Deficiencies

NEW QUESTION: 235

律師進行的哪些活動可能是洗錢的危險訊號？（選兩個）

A. 律師沒有提供所要求的特定服務的經驗。

B. 律師工作時間不尋常，以履行案件職責。

C. 律師的報酬遠高於平常的費用。

D. 律師沒有記錄所提供服務的案例口明。

E. 律師花了兩天處理這個案子。

Answer: A,C (LEAVE A REPLY)

Lawyers who lack experience in providing specific services requested by clients or receive unusually high fees can raise red flags for money laundering. Inadequate documentation of case notes may also be suspicious, but the absence of experience and excessive fees are more significant indicators. These behaviors warrant further scrutiny to assess potential money laundering risks¹².

References:

1. ComplyAdvantage: AML Red Flags - What are the Top 10 Indicators?

2. HyperVerge: AML Red Flags: A Guide to Identification and Response

NEW QUESTION: 236

一名學生聯絡房地口經紀人看房，但因生病而在最後一刻取消。儘管經紀人反對要價，但該學生仍希望盡快購買價口 80 萬美元的房屋，該房屋的價口被高估了。經紀人應該識別哪些房地口危險訊號？（選三）

A. 匿名

B. 構建

C. 口

D. 流過

E. 不一致

F. 交易速度

Answer: (SHOW ANSWER)

The scenario described in the question presents several indicators of potential money laundering through real estate, which the broker should be aware of and report accordingly. The most relevant red flags are:

Value: The student wants to buy a home that is overvalued, meaning that the asking price is higher than the market value or the appraisal value of the property. This could indicate that the student is trying to launder a large amount of illicit funds in one transaction, or that the seller is colluding with the student to inflate the price and receive a kickback. Overvaluing or undervaluing properties is a common technique used by money launderers to manipulate the price of real estate and conceal the source or destination of their funds¹².

Inconsistency: The student's behavior and profile are inconsistent with the typical characteristics of a legitimate home buyer. The student cancels the viewing of the home at the last minute due to illness, which could suggest a lack of interest or a pretext to avoid scrutiny. The student also wants to buy an expensive home despite being a student, which could indicate a discrepancy between the student's income and the source of funds. Moreover, the student disregards the broker's objections to the asking price, which could imply that the student is not concerned about the value or quality of the property, but rather the amount of money that can be laundered through it³⁴.

Transaction speed: The student wants to quickly buy the home, which could indicate a sense of urgency or pressure to move the illicit funds before they are detected or seized by the authorities.

Money launderers often use fast transactions to avoid raising suspicion or leaving a paper trail.

Transaction speed is especially relevant when combined with other red flags, such as cash payments, anonymous buyers, or overvalued properties⁵.

References:

Understanding Money Laundering in Real Estate

RED FLAG INDICATORS FOR REAL ESTATE SECTOR

Investigating Money Laundering through Real Estate

AML Red Flags Associated with Real Estate Sector Businesses

FinCEN Proposes Rule to Combat Money Laundering and Promote Transparency in Residential Real Estate

[ACAMS Study Guide, 6th Edition, Chapter 7, pp. 200-201]

NEW QUESTION: 237

在實施新進員工篩檢計畫時，反洗錢官員應與下列哪一項進行協調？

A. 口部稽核員

B. 地方金融情報機構

C. 人力資源

D. 機構監理者

Answer: (SHOW ANSWER)

An anti-money laundering officer should coordinate with human resources when implementing a new hire screening program, because human resources is responsible for managing the recruitment, hiring, and training of employees, as well as ensuring compliance with labor laws and regulations. A new hire screening program is a key component of an effective anti-money laundering (AML) program, as it helps to prevent the hiring of individuals who may pose a risk of facilitating money laundering, terrorist financing, or other financial crimes, or who may have a criminal or disciplinary history that could compromise the integrity of the institution. A new hire screening program should include background checks, verification of credentials and references, and assessment of skills and competencies relevant to the AML function. An anti-money laundering officer should work closely with human resources to establish the criteria, procedures, and documentation for the screening program, as well as to monitor its implementation and effectiveness.

ACAMS CAMS Certification Video Training Course¹, Module 4: Developing an AML Program, Lesson 4.2:

Developing an AML Program

ACAMS CAMS Study Guide, 6th Edition², Chapter 4: Developing an AML Program, Section 4.2:

Developing an AML Program, pp. 81-82

ACAMS CAMS Examination Preparation Seminar, 6th Edition³, Chapter 4: Developing an AML Program, Section 4.2: Developing an AML Program, Slide 20

NEW QUESTION: 238

對於開立新帳口的新客口，金融機構應檢視哪三個因素？選出3 個答案

- A. 客口來自或開展業務的國家或地區
- B. 客口經營的企業的類型和規模
- C. 客口業務的法律結構
- D. 客口之前開口的金融機構

Answer: ([SHOW ANSWER](#))

A financial institution should examine the country or location where the customer is from or does business, the type and size of the business the customer runs, and the legal structure of the customer's business, because these factors can indicate the level of money laundering risk associated with the customer. For example, some countries or locations may have weak anti-money laundering laws or high levels of corruption, some types or sizes of businesses may be more prone to generating or concealing illicit funds, and some legal structures may be more complex or opaque than others, making it harder to identify the beneficial owners or controllers of the customer.

ACAMS CAMS Certification Video Training Course¹, Module 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Lesson 2: Know Your Customer (KYC) and Customer Due Diligence (CDD) ACAMS CAMS Certification Study Guide², Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Section 2.2: Know Your Customer (KYC) and Customer Due Diligence (CDD), Pages 42-44

NEW QUESTION: 239

一家總部位於法國的石油勘探公司與伊朗的煉油廠有業務往來，該煉油廠受到外國資口管制辦公室 (OFAC) 的全面制裁。OFAC 應針對這家法國公司實施哪種類型的制裁？

- A. 部門
- B. 基於國家/地區
- C. 次要
- D. 基於列表

Answer: (SHOW ANSWER)

OFAC imposes secondary sanctions on non-US entities (like a French oil company) that do business with comprehensively sanctioned countries (such as Iran). Secondary sanctions are designed to discourage non-US persons from engaging in certain activities with sanctioned countries or individuals, even if there is no direct US nexus in the transaction. The CAMS 6th Edition and OFAC documentation explain that secondary sanctions can restrict access to US markets, banks, or the US financial system for violators. This is different from primary sanctions, which directly prohibit US persons from certain transactions.

References:

CAMS 6th Edition, Chapter 6: "Sanctions Compliance"

US Treasury, OFAC FAQs on Iran Sanctions

"Secondary sanctions" definition and examples, see also US Iran Sanctions (31 CFR Part 560)

NEW QUESTION: 240

一位貴金屬交易商在銀行開設了一個新帳戶。哪一個需要移交反洗錢調查進行進一步審查？

- A. 來自與貴金屬交易商建立了合作關係的外國公司的國際收款
- B. 帳口付款涉及來自高風險司法管轄區的未知公司
- C. 發送至屬於鑽石通路一部分的鑽石經銷商的國際電匯
- D. 來自看似個人的第三方的每日多筆銷售點交易

Answer: (SHOW ANSWER)

According to the ACAMS Study Guide for the CAMS Certification Exam (6th edition), page 211, dealers in precious metals and stones (DPMS) are vulnerable to money laundering and terrorist financing risks due to the high value, portability, and fungibility of their products. Therefore, DPMS should apply a risk-based approach to their AML/CFT compliance program and monitor their customers and transactions for any red flags or suspicious activities. One of the red flags for DPMS is receiving payments from or sending payments to unknown or unverified third parties, especially if they are located in high-risk jurisdictions that have weak AML/CFT controls, are subject to sanctions, or are known to be sources or destinations of illicit funds.

Such payments may indicate that the DPMS is being used as a conduit or a front for money laundering, terrorist financing, tax evasion, or other criminal activities. Therefore, if a precious metals dealer opens a new account with a bank and receives or makes payments that reference unknown companies from high-risk jurisdictions, the bank should refer the account to AML investigations for further review and verification of the source and purpose of the funds, the identity and legitimacy of the third parties, and the nature and rationale of the business relationship.

References:

ACAMS Study Guide for the CAMS Certification Exam (6th edition), page 2111 FATF Guidance on the Risk-Based Approach for Dealers in Precious Metals and Stones² Risk-Based Approach for Dealers in Precious Metals and Stones (DPMS)³

NEW QUESTION: 241

一家外國銀行在美國設有代理帳戶。根據美國當局的調查，該特定代理帳戶似乎促進了涉及受污染資金的交易。

這使得美國當局能夠扣押外國銀行在美國銀行持有的資金？

- A. FinCEN CDD 最終規則
- B. 第六條歐盟反洗錢指令
- C. 美國財政部 OFAC 的規定
- D. 美國愛國者法案

Answer: (SHOW ANSWER)

The USA PATRIOT Act is a comprehensive legislation that was enacted in 2001 to enhance the powers and tools of the US authorities to combat money laundering, terrorist financing, and other threats to the national security and the integrity of the financial system. The USA PATRIOT Act contains several provisions that affect the relationship between US banks and foreign banks that maintain correspondent accounts in the US.

One of these provisions is Section 319, which allows the US authorities to seize the funds of a foreign bank held with a US bank, if the foreign bank refuses to comply with a subpoena or a request for records related to the correspondent account. This provision is intended to prevent foreign banks from using their correspondent accounts in the US to facilitate transactions involving tainted funds, such as proceeds of crime, funds intended to support terrorism, or funds subject to sanctions or asset freezing orders. Section 319 also requires US banks to maintain records of the owners and agents of foreign banks that have correspondent accounts with them, and to terminate such accounts if requested by the US authorities.

Therefore, if a foreign bank maintains a correspondent account in the US, and the US authorities find out that the account has been used to facilitate a transaction involving tainted funds, the US authorities can seize the funds of the foreign bank held with the US bank, under the authority of the USA PATRIOT Act.

CAMS Study Guide - 6th Edition, Chapter 1, Section 1.2, page 10

USA PATRIOT Act, Section 319, page 55-57

The USA PATRIOT Act: A Legal Analysis, Section III, page 9-10

[The USA PATRIOT

Reference: <https://www.fincen.gov/fact-sheet-section-312-usa-patriot-act-final-regulation-and-notice-proposed-rulemaking>

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NEW QUESTION: 242

在向授權請求者提供可疑活動報告文件之前，機構應首先：

- A. 聯絡當地金融情報機構以取得授權。
- B. 通知外部顧問。
- C. 請求傳票。
- D. 獨立驗證請求者。

Answer: (SHOW ANSWER)

According to the guidance issued by FinCEN and the Federal banking agencies, when a financial institution receives a request for SAR supporting documentation from FinCEN or an appropriate law enforcement or supervisory agency, it must first verify that the requestor is, in fact, a representative of such an agency. This is to ensure the confidentiality and security of the SAR information and to prevent unauthorized disclosures. A financial institution should have procedures for such verification in its BSA/AML compliance program, which may include, for example, independent employment verification with the requestor's field office or face-to-face review of the requestor's credentials.

References:

- 1: This web page explains the BSA requirement that financial institutions provide SAR supporting documentation in response to requests by FinCEN and appropriate law enforcement or supervisory agencies, and the need to verify the requestor's identity.
- 2: This document provides answers to frequently asked questions regarding SARs and other AML considerations, including the question of how to handle "keep open" requests from law enforcement.

NEW QUESTION: 243

採取基於風險的方法對於金融機構了解其面臨的洗錢和恐怖主義融資風險至關重要。制定洗錢和恐怖主義融資風險評估是關鍵的起點。

常用的風險因素包括。（選擇三項）

- A. 口品風險。
- B. 信用風險。
- C. 地理風險。
- D. 客口風險。
- E. 流動性風險。

Answer: (SHOW ANSWER)

The CAMS 6th Edition clearly identifies a risk-based approach as the cornerstone of effective AML/CFT programs. Risk assessments should consider various risk factors that directly influence exposure to ML/TF.

* Product risk (A): Certain products or services may present higher ML/TF risks, such as private banking, correspondent banking, or cash-intensive products."Products and services offered, and their inherent risk levels, must be assessed as part of the risk-based approach."(CAMS 6th Edition, AML Compliance Program, Risk Assessment)

* Geographic risk (C): Jurisdictions where the customer operates or where transactions are conducted may present higher or lower risks due to factors such as weak AML regulations or high corruption. "Geographic risk considers where a customer is located and/or where transactions occur, referencing countries with increased risk, such as those identified by the FATF."(CAMS 6th Edition, Risk Assessment Factors)

* Customer risk (D): The type of customer, such as PEPs, non-residents, or companies with complex structures, may present higher ML/TF risks."Customer risk assessment is based on the customer's profile, activity, and ownership structure, and is a critical component in risk-based monitoring."(CAMS 6th Edition, CDD/EDD) Incorrect Options:

* B (Credit risk): Related to creditworthiness, not ML/TF.

* E (Liquidity risk): Refers to a firm's ability to meet financial obligations; not an AML risk factor.

References:

CAMS Study Guide 6th Edition, AML Compliance Program, "Risk-Based Approach" FATF Guidance: National Money Laundering and Terrorist Financing Risk Assessment (2013)

NEW QUESTION: 244

2012 年匯豐銀行與美國當局達成的和解證明，違反反洗錢法的機構面臨哪兩項風險？（選兩個）

A. 沒收資□

B. 民事罰款

C. 銀行執照/許可證遺失

D. 銀行員工入獄

Answer: ([SHOW ANSWER](#))

Institutions that violate anti-money laundering laws may face various risks and consequences, such as legal, regulatory, reputational, and operational risks. As demonstrated by the 2012 HSBC settlement with United States authorities, two of the most significant risks are:

* Forfeiture of assets. This means that the institution may have to surrender some or all of its assets that are related to the money laundering activities or violations. For example, HSBC agreed to forfeit \$1.256 billion as part of its deferred prosecution agreement with the US Department of Justice¹.

* Civil money penalties. This means that the institution may have to pay fines or penalties to the government or other regulatory agencies for violating the anti-money laundering laws or regulations. For example, HSBC agreed to pay \$665 million in civil money penalties to various US regulators, including the Office of Foreign Assets Control, the Federal Reserve Board, and the Office of the Comptroller of the Currency¹.

The other two options, C and D, are not as common or relevant to the 2012 HSBC settlement. Loss of bank charter/license may occur in extreme cases where the institution is deemed unfit to operate or poses a serious threat to the financial system. Imprisonment of bank employees may occur if the employees are found guilty of criminal charges, such as fraud, conspiracy, or wilful violation of anti-

money laundering laws. However, these outcomes are usually reserved for individuals, not institutions, and depend on the specific facts and circumstances of each case.

1: HSBC announces settlements with authorities, 2012,

<https://www.hsbc.com/-/files/hsbc/investors/stock-exchange-announcements/2012/december/2012-12-11-hsbc-announces-settlements-with-authorities.pdf>

2: Settlement Agreement between the U.S. Department of the Treasury's Office of Foreign Assets Control and HSBC Holdings plc, 2012, https://ofac.treasury.gov/recent-actions/20121211_33

3: HSBC settles on record US fee, 2012, <https://www.dw.com/en/hsbc-settles-in-us-money-laundering-probe>

[/a-16443391](https://www.dw.com/en/hsbc-settles-in-us-money-laundering-probe/a-16443391)

4: HSBC pays record \$1.9bn fine to settle US money-laundering accusations, 2012,

<https://www.theguardian.com/business/2012/dec/11/hsbc-bank-us-money-laundering>

5: HSBC to pay \$1.9bn in US money laundering penalties, 2012, <https://www.bbc.com/news/business-20673466>

NEW QUESTION: 245

一家銀行加入了公私合作夥伴關係 (PPP)，與執法部門和監管機構合作打擊金融犯罪。然而，該銀行的資料保護官擔心敏感客戶資料的洩露，而合規官則擔心從政府獲取有用資訊可能會出現延誤。

下列何者最能描述 PPP 在打擊金融犯罪的優勢？

- A. PPP 透過在銀行和執法部門之間共享情報來改善金融犯罪的偵查和預防。
- B. PPP 允許銀行管理自己的可疑活動報告 (SAR) 歸檔流程，而無需金融情報部門 (FIU) 的參與。
- C. PPP 透過提供來自執法部門的即時情報，最大限度地提高銀行合規計畫的效率。
- D. PPP 透過自動化資訊共享幫助銀行降低合規成本。

Answer: (SHOW ANSWER)

NEW QUESTION: 246

如果銀行懷疑其員工可能涉及抵押貸款欺詐，該怎麼辦？

- A. 如果管理階層認為員工的活動可疑，請提交可疑活動報告。
- B. 透過收集和分析有關員工的資訊來進行調查。
- C. 自動向警方提交有關員工潛在不當行為的報告。
- D. 對員工提起民事訴訟，要求賠償所造成的損失。

Answer: (SHOW ANSWER)

According to the ACAMS Study Guide for the CAMS Certification Exam (6th edition), page 215, one of the best practices for banks to prevent and detect mortgage fraud is to conduct internal investigations when there are red flags or suspicions of fraud involving bank employees. The investigation should include reviewing the employee's loan files, interviewing the employee and other relevant parties, verifying the information and documents provided by the employee, and documenting the findings and actions taken. Filing a suspicious activity report (SAR) may be appropriate after the investigation is completed and the bank has reasonable grounds to suspect fraud. Filing a police report or initiating civil

litigation may also be options depending on the outcome of the investigation and the bank's policies, but they are not the first steps to take when the bank suspects an employee of mortgage fraud.

References:

ACAMS Study Guide for the CAMS Certification Exam (6th edition), page 2151 Mortgage Fraud: Understanding and Avoiding It2 Mortgage Fraud: What You Need To Know3

NEW QUESTION: 247

使用基於風險的方法分配合規資源的主要優點是什麼？

- A. 它降低了合規計畫的總體成本。
- B. 它消除了對低風險客戶進行定期審計的需要。
- C. 確保專注於高風險領域，同時維持營運效率。
- D. 它標準化了所有地區的合規流程。

Answer: (SHOW ANSWER)

The CAMS 6th Edition highlights that a risk-based approach enables organizations to efficiently allocate compliance resources, focusing efforts on areas presenting the highest risk, thereby ensuring both regulatory compliance and operational effectiveness.

"A risk-based approach allows firms to concentrate resources and controls where the risk of ML/TF is highest, while applying simplified measures to lower-risk areas. This enhances both effectiveness and efficiency." (CAMS 6th Edition, AML Compliance Program: Risk-Based Approach) Incorrect Options:

- * A: Cost savings may occur, but it is not the main advantage.
- * B: Audits may still be required, just less frequently for low-risk customers.
- * D: Risk-based approaches are tailored, not standardized, across regions.

References:

CAMS Study Guide 6th Edition, AML Compliance Program, "Risk-Based Approach" FATF Recommendation 1: Assessing risks and applying a risk-based approach

NEW QUESTION: 248

為了解客戶的營運是否符合公司對特定行業的風險偏好，金融機構必須：

- A. 取得足夠的客戶資訊以了解客戶關係的性質和目的，以建立客戶風險狀況。
- B. 透過代表法人實體客戶開設帳戶的個人填寫完整的證明表格，取得受益所有人的身分資訊。
- C. 取得購買貨幣工具的非客戶的姓名和地址、國家/地區識別號碼和出生日期。
- D. 在開口前取得每位客戶的姓名、出生日期、地址和身分證號碼。

Answer: (SHOW ANSWER)

Customer due diligence (CDD) is a key component of anti-money laundering (AML) and counter-terrorism financing (CTF) compliance. CDD helps financial institutions identify and verify their customers, assess their risk levels, and monitor their transactions for suspicious activity.

One of the main objectives of CDD is to understand the nature and purpose of customer relationships, which involves collecting and analyzing relevant information about the customer's business activities, expected transaction patterns, source and destination of funds, and beneficial ownership. This

information helps financial institutions develop a customer risk profile, which is a tool to measure and manage the risk exposure of each customer.

A customer risk profile reflects the financial institution's risk appetite, which is the level and type of risk that the institution is willing and able to accept. By comparing the customer's risk profile with the institution's risk appetite, the institution can determine if the customer operates in line with the firm's expectations and requirements for a specific industry segment. For example, if the institution has a low risk appetite for customers involved in high-risk sectors such as gambling, cryptocurrency, or arms trade, it can use the customer risk profile to identify and mitigate any potential risks associated with such customers.

Therefore, to understand if the customer operates in line with the firm's risk appetite for a specific industry segment, a financial institution must obtain sufficient customer information to understand the nature and purpose of customer relationships for the purpose of developing a customer risk profile.

References:

A Guide to Customer Due Diligence for Financial Institutions

Customer Due Diligence Guide: Main Requirements, Best Practices & Checklist Financial Crimes

Enforcement Network Issues New Frequently Asked Questions on Customer Due Diligence

Requirements ACAMS CAMS Certification Study Guide 6th Edition

NEW QUESTION: 249

沃爾夫斯堡私人銀行反洗錢原則要求新客戶須經誰批准？

- A. 董事會
- B. 私人銀行家
- C. 私人銀行家的主管
- D. 私人銀行家以外的至少一人

Answer: (SHOW ANSWER)

The Wolfsberg Anti-Money Laundering Principles for Private Banking require new clients to be approved by at least one person other than the private banker. This is because the private banker may have a conflict of interest or be influenced by the client's wealth or reputation. The approval process should involve a senior manager or a compliance officer who can independently assess the client's risk profile and suitability for the institution's services¹².

1: CAMS Certification Package - 6th Edition | ACAMS, Chapter 2: Money Laundering Risks and Methods, p. 37 2: The Wolfsberg Group, The Wolfsberg Anti-Money Laundering Principles for Private Banking, June

2000, p. 3, <https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/Wolfsberg-AML-Principles-for-Private-Banking-June-2000.pdf> Reference:[https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/wolfsberg-standards/10.%20Wolfsberg-Private-Banking-Principles-May-2012.pdf\(04\)](https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/wolfsberg-standards/10.%20Wolfsberg-Private-Banking-Principles-May-2012.pdf(04))

NEW QUESTION: 250

一名英國國民在比利時的一家銀行擁有帳戶，該銀行在紐約設有分行。這名英國國民最近已被添加到外國資產管制辦公室 (OFAC) 特別指定國民和被封鎖人員名單中並進行篩選。比利時銀行應該採取什麼行動？

- A. 允許所有交易達到 OFAC 規定的限額，並向當地金融情報機構報告交易。
- B. 凍結客戶的資戶並向 OFAC 報告。
- C. 關閉帳戶並要求客戶將資金轉入美國的銀行帳戶。
- D. 繼續執行交易，因為銀行總部位於比利時。

Answer: B (LEAVE A REPLY)

The Belgian bank should freeze the assets of the customer and report to OFAC, as this is the required action for any US person or entity, or any person or entity within the US, that holds or controls property or interests in property of a person or entity on the OFAC Specially Designated Nationals and Blocked Persons List (SDN List). The SDN List is a list of individuals and entities that are subject to US sanctions and whose assets are blocked by OFAC. The Belgian bank, by maintaining a branch in New York, is subject to the jurisdiction and authority of OFAC, and must comply with its regulations and directives. Allowing transactions, closing the account, or continuing business as usual would violate the sanctions and expose the bank to civil and criminal penalties.

References:

ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 6, Section 6.2.1, p. 1691 ACAMS CAMS Certification Exam Outline, 6th Edition, Domain 3, Task 3.1, p. 62 OFAC FAQs: Sanctions Compliance, Question 973 OFAC FAQs: General Questions, Question 84

NEW QUESTION: 251

一家電信公司的客戶收到一封電子郵件，解釋他們上次訂單的問題。客戶透過電子郵件中的連結被引導至該公司網站以提供個人資訊。該電子郵件和網站都是假的。實施了什麼類型的網路犯罪？

- A. 惡意軟體
- B. 加密劫持
- C. 魚叉式網路釣魚
- D. 翻滾

Answer: (SHOW ANSWER)

Spear phishing is a targeted form of phishing scam in which cybercriminals send highly convincing emails to specific individuals within an organization. The emails often contain personal information or details that make them seem legitimate and trustworthy. The goal of spear phishing is to trick the recipients into clicking a malicious link or downloading an infected attachment, or to reveal confidential information or money to the attackers. In this case, the customers of the telecommunications firm received an email that pretended to be from the company, but was actually a fake. The email directed them to a spoofed website that asked for their personal information, which could be used for identity theft or fraud. This is a clear example of a spear phishing attack.

References:

What is Spear Phishing? Definition and Prevention | Fortinet

What is spear phishing? Examples, tactics, and techniques | CSO Online

Spear phishing - OxfordDictionaries

NEW QUESTION: 252

埃格蒙特集團建議建立一個有效的國家金融情報機構 (FIU) 的核心目標是什麼？

- A. 金融情報機構的運作場所必須與其他執法機構和政府辦公室分開。
- B. 金融情報機構符合埃格蒙特集團的評估標準。
- C. 金融情報機構必須在國家和國際利益相關者之間獲得口對信任，然後才能放心地交換敏感資訊。
- D. 金融情報機構必須能口宣傳政府承諾在國口建立一個無腐敗社會的價口。

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) resources, the Egmont Group is an international network of FIUs that facilitates and prompts the exchange of information, knowledge, and cooperation among its members to combat money laundering, terrorist financing, and associated predicate offences¹. The Egmont Group suggests that one of the core objectives that would lead to an effective national FIU is to have absolute trust amongst national and international stakeholders before sensitive information will be exchanged with confidence². This means that the FIU should establish and maintain a high level of credibility, professionalism, and integrity in its operations, and ensure that the information it receives and disseminates is protected and used appropriately. The FIU should also comply with the Egmont Group's principles and standards for information exchange, and foster a culture of mutual trust and cooperation with other FIUs and relevant authorities³.

The other three options are incorrect because:

The FIU must operate from physically separated premises from other law enforcement agencies and government offices is not a core objective that the Egmont Group suggests for an effective national FIU.

While the FIU should have operational independence and autonomy, and be free from undue influence or interference, it does not necessarily have to be physically separated from other agencies or offices. The FIU may be located within the judicial, law enforcement, administrative, or hybrid model, depending on the country's legal and institutional framework⁴.

The FIU meets the Egmont Group assessment criteria is not a core objective that the Egmont Group suggests for an effective national FIU. While meeting the Egmont Group assessment criteria is a requirement for becoming and remaining a member of the Egmont Group, it is not an objective in itself. The assessment criteria are based on the FATF recommendations and the Egmont Group's own documents, and they serve as a benchmark for evaluating the FIU's compliance and effectiveness⁵.

The FIU must be able to promote the value of the government's commitment to embed a corruption free society within the country is not a core objective that the Egmont Group suggests for an effective national FIU. While the FIU may contribute to the prevention and detection of corruption, as well as the recovery of illicit assets, by analyzing and sharing financial intelligence, it is not the sole or primary responsibility of the FIU to promote the value of the government's commitment to embed a corruption free society within the country. This is a broader and more complex goal that involves multiple actors and factors, such as political will, legal framework, institutional capacity, civil society, media, and international cooperation.

1: ACAMS, CAMS Study Guide, 6th Edition, Chapter 3, p. 64 2: Egmont Group, Egmont Group of Financial Intelligence Units Principles for Information Exchange Between Financial Intelligence Units, June 2013, 3, p. 2 3: Egmont Group, Egmont Group of Financial Intelligence Units Principles for Information Exchange Between Financial Intelligence Units, June 2013, 3, p. 3-4 4: ACAMS, CAMS

Study Guide, 6th Edition, Chapter 3, p. 67 5: Egmont Group, Egmont Group of Financial Intelligence Units Support and Compliance Process, June 2013, [6], p. 3-4 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 4, p. 91-92 Reference:

<https://www.elibrary.imf.org/view/books/069/02365-9781589063495-en/ap01.xml>

NEW QUESTION: 253

透過多個帳戶進行交易的術語是什麼，其中個人口生抵銷利潤和損失，並透過似乎不受共同控制的帳戶轉移頭寸？

- A. 龐氏騙局
- B. 市場操弄
- C. 淨交易
- D. 清洗交易

Answer: D (LEAVE A REPLY)

Wash trading is the term for trading through multiple accounts, where an individual generates offsetting profits and losses and transfers of positions through accounts that do not appear to be commonly controlled.

Wash trading is a form of market manipulation that creates artificial trading activity and volume, and may be used to evade taxes, inflate prices, or launder money. Wash trading can also involve the use of third parties or intermediaries to conceal the true identity and source of funds of the trader.

= The main references for this question are the following sources:

The document titled "Money Laundering and Terrorist Financing Typologies and Trends in Canadian Securities Dealers" published by the Investment Industry Regulatory Organization of Canada (IIROC) in December 2019. You can access it by clicking here. This document states that "Wash trading is a form of market manipulation where an individual simultaneously sells and buys the same financial instruments to create misleading, artificial activity in the marketplace. Wash trading is illegal under securities law because it misleads investors and regulators about the true supply and demand of the securities involved. Wash trading can also be used to evade taxes, inflate prices, or launder money."

The document titled "Market Manipulation" published by the Financial Industry Regulatory Authority (FINRA). You can access it by clicking here. This document states that "Wash sales are a form of market manipulation in which an investor simultaneously sells and buys the same security to create misleading, artificial activity in the marketplace. Wash sales are illegal under Section 9(a)(1)(A) of the Securities Exchange Act of 1934. Wash sales can be used to manipulate the price of a security, evade taxes, or launder money."

NEW QUESTION: 254

哪些經濟和社會因素可能會造成對非法活動和洗錢的依賴？

(選兩個)

- A. 更廣泛地接觸組織犯罪和腐敗
- B. 公共服務和政府資金的薄弱
- C. 私部門合法性的弱點
- D. 金融包容性較弱

E. 經濟和就業機會發展較弱

Answer: (SHOW ANSWER)

Wider exposure to organized crime and corruption: When individuals or communities are exposed to organized crime networks or corrupt practices, they may become more susceptible to engaging in illicit activities. Organized crime groups often exploit vulnerabilities, leading to money laundering.

Weaker development of economy and job opportunities: In regions with limited economic growth and scarce job prospects, individuals may turn to illicit activities as a means of survival. Poverty and lack of legitimate income sources can drive people toward money laundering.

References:

1. World Bank Document: "Illicit Activity and Money Laundering from an Economic Growth Perspective" 1.
2. The Social Impact Of Money Laundering 2.
3. Money Laundering: History, Regulations, and Techniques 3.
4. The IMF and the Fight Against Illicit Financial Flows 4.
5. SSRN Paper: "Illicit Activity and Money Laundering from an Economic Growth" 5.

NEW QUESTION: 255

下列哪些口容屬於金融行動特別工作小組 (FATF) 方法論中概述的 11 項直接成果，用於評估在相互評估期間反洗錢/反恐怖主義融資/中央財政基金系統的有效性？（選擇三項）

- A. 國際合作提供了可用於打擊犯罪者的可操作資訊。
- B. 監理機關負責監理金融機構和非銀行金融機構及其基於風險的反洗錢/反恐怖主義融資計劃。
- C. 金融情報資訊由當局收集並與 FATF 分享，以供進一步調口。
- D. 被判犯洗錢罪的人將無法獲得基本的銀行服務。
- E. 洗錢犯罪將受到調口並受到刑事起訴。

Answer: (SHOW ANSWER)

The FATF Immediate Outcomes (IOs) measure the effectiveness of AML/CFT frameworks in jurisdictions.

Option A (Correct): International cooperation is key to combating financial crime, as outlined in Immediate Outcome 2.

Option B (Correct): Effective regulation of financial institutions is part of Immediate Outcome 3, which ensures compliance with AML laws.

Option E (Correct): Investigation and prosecution of money laundering offenses align with Immediate Outcome

7.

Option C (Incorrect): FATF itself does not conduct investigations; FIUs share intelligence with domestic and international agencies.

Option D (Incorrect): While financial criminals face legal consequences, there is no global mandate to restrict their access to banking.

Reference: FATF Methodology for Assessing AML/CFT Systems (Immediate Outcomes 1-11).

NEW QUESTION: 256

根據金融行動特別工作小組的規定，在什麼情況下金融機構應退出與客戶的關係？

- A. 客戶端拒口更新資訊。
- B. 所有權結構發生變化。
- C. 客戶是政治公眾人物。
- D. 公司註冊所在國家已提升為高風險。

Answer: (SHOW ANSWER)

According to the Financial Action Task Force (FATF), financial institutions should apply a risk-based approach to customer due diligence (CDD), which includes obtaining and updating information on the identity, beneficial ownership, and business activities of their clients. If a client refuses to provide or update such information, or provides false or misleading information, the financial institution should consider this as a red flag for potential money laundering or terrorist financing, and should exit the relationship with the client, unless the circumstances warrant otherwise. Exiting the relationship with a client who refuses to update information is also consistent with the FATF's Recommendation 10, which requires financial institutions to terminate the business relationship if they are unable to perform CDD measures.

References:

1: This document contains the FATF's 40 Recommendations, which are the international standards for combating money laundering and terrorist financing. Recommendation 10 covers the CDD requirements for financial institutions, and paragraph 22 states that "If the financial institution is unable to comply with paragraphs 10 to 12, 15 and 17, it should not open the account, commence business relations or perform the transaction; or should terminate the business relationship; and should consider making a suspicious transactions report in relation to the customer."

2: This document provides guidance on the implementation of the FATF's Recommendations on transparency and beneficial ownership, which are relevant for CDD purposes. It explains the definition of beneficial owner, the risks associated with legal persons and arrangements, and the effective mechanisms to combat the misuse of such entities. It also provides examples of situations where financial institutions should exit the relationship with a client, such as when the client refuses to provide or update information on beneficial ownership or control, or when the client is a shell company or a trust with no legitimate economic purpose.

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NEW QUESTION: 257

根據《美國愛國者法案》，美國金融機構在與國際機構開展業務時有哪兩項要求？（選兩個）

- A. 對空殼銀行進行強化盡職調查
- B. 對代理帳戶進行盡職調查
- C. 參觀國際金融機構總部
- D. 遵守美國愛國者法案頒布的特別措施

Answer: A,B ([LEAVE A REPLY](#))

The USA PATRIOT Act imposes several requirements on U.S. financial institutions when dealing with foreign financial institutions, especially those that pose a high risk of money laundering or terrorist financing.

Two of these requirements are:

Performing enhanced due diligence on shell banks: A shell bank is a bank that has no physical presence in any country and is not affiliated with a regulated financial group. The USA PATRIOT Act prohibits U.S. financial institutions from opening or maintaining correspondent accounts for shell banks, and requires them to take reasonable steps to ensure that their correspondent accounts are not being used by shell banks indirectly¹².

Performing due diligence on correspondent accounts: A correspondent account is an account established by a financial institution to receive deposits from, make payments on behalf of, or handle other financial transactions for a foreign financial institution. The USA PATRIOT Act requires U.S. financial institutions to collect and verify certain information about the foreign financial institution, such as its ownership, licensing, and anti-money laundering policies, and to assess the risk of money laundering or terrorist financing associated with the correspondent account¹³.

CAMS Certification Package - 6th Edition | ACAMS, Chapter 3: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), pages 82-84
CAMS Certifications: How to Get CAMS Certified | ACAMS, Candidate Handbook, page 14
ACAMS CAMS Certification Video Training Course - Exam-Labs, Video 3.4: Correspondent Banking and Money Laundering Risks

NEW QUESTION: 258

哪種線上賭博計劃涉及用存入的資金下注並與其他玩家勾結以掩蓋資金來源？

- A. 隱藏
- B. 協調投注
- C. 球員間轉會
- D. 晶片傾銷

Answer: ([SHOW ANSWER](#))

Chip dumping is a common money laundering technique in online gambling.

* Option D (Correct): Chip dumping occurs when players collude to transfer funds via staged betting, making illicit funds appear as gambling winnings.

* Option A (Incorrect): Concealment is a broad term, not a specific technique.

* Option B (Incorrect): Coordinated betting refers to match-fixing, not money laundering.

* Option C (Incorrect): Player-to-player transfers are used in money laundering but are not specific to online gambling.

Reference:FATF Report on Virtual Assets and Online Gambling (2021), Wolfsberg Group Gaming AML Guidelines.

NEW QUESTION: 259

什麼樣的人應該對機構的反洗錢計畫進行獨立測試？

- A. 反洗錢領域的認證專家
- B. 類似機構的前反洗錢官員
- C. 直接向董事會或董事會委員會報告的人員
- D. 退休的政府監管者或聯邦執法官員

Answer: ([SHOW ANSWER](#))

According to the Anti-Money Laundering Specialist (the 6th edition) by ACAMS, the independent testing of an institution's anti-money laundering program should be conducted by a person who reports directly to the Board of Directors or a Board Committee. This ensures that the person conducting the testing has the necessary authority, independence, and objectivity to evaluate the program's adequacy and effectiveness, and to report any findings or recommendations to the senior management¹. The person conducting the testing should also have the appropriate knowledge, skills, and experience in the anti-money laundering field, and should be familiar with the institution's products, services, customers, and risks².

The other options are not necessarily suitable or qualified to perform the independent testing of an institution's anti-money laundering program. For example:

A certified specialist in the anti-money laundering field may have the relevant expertise and credentials, but may not have the required independence or reporting line to conduct the testing. For instance, if the certified specialist is an employee of the institution who is involved in the implementation or operation of the anti-money laundering program, then there may be a conflict of interest or a lack of objectivity in the testing process¹.

A former anti-money laundering officer from a similar institution may have the relevant experience and background, but may not have the current knowledge or familiarity with the institution's anti-money laundering program, policies, procedures, or systems. Moreover, the former anti-money laundering officer may have a personal or professional relationship with the institution or its staff, which may compromise the independence or integrity of the testing process¹.

A retired government regulator or federal law enforcement officer may have the relevant authority and credibility, but may not have the specific skills or qualifications to conduct the testing. For instance, the retired regulator or law enforcement officer may not be well-versed in the latest anti-money laundering standards, regulations, or best practices, or may not be able to apply them to the institution's unique risk profile, products, services, or customers¹.

Anti-Money Laundering Specialist (the 6th edition) by ACAMS

What Is An AML Compliance Program? | ComplyAdvantage

NEW QUESTION: 260

銀行 A 位於 A 國。來自位於 B 國的銀行 B 的電匯由銀行 A 處理，資金將轉至位於 C 國的銀行 C 的客戶。銀行 A 認為該電匯可疑。

A 銀行應該向誰提交可疑交易報告？

- A. A 國的交易
- B. A 國的銀行 B
- C. B 國的交易
- D. C 國的 C 銀行

Answer: (SHOW ANSWER)

According to the CAMS Certification Package - 6th Edition¹, 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.

CAMS Certification Package - 6th Edition¹, Chapter 4: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Section: Wire Transfers, pp. 161-162.

NEW QUESTION: 261

根據金融行動特別工作組 (FATF) 的數據與環境犯罪洗錢收益相關的潛在風險指標包括：(選擇兩個)

- A. 從現金密集型企業向金礦開採、非法採伐和非法土地清理地區的受益人提供的小額現金轉移。
- B. 涉及高級官員或政治公眾人物向其家庭成員轉移不明財富和現金，這些人員的職位與自然資源的管理或保護有關。
- C. 伐木公司經常付款。磨粉或廢料貿易部門提供給與合法牧師活動或業務無關的個人或受益人。
- D. 位於高風險管轄區的廢棄物管理行業公司，其廢棄物付款或貿易發票與其被授權處理的廢棄物類型一致。

Answer: (SHOW ANSWER)

NEW QUESTION: 262

根據《沃爾夫斯堡私人銀行反洗錢原則》，哪兩個人通常是私人銀行帳戶的受益所有人？(選兩個)

- A. 這兩個是該帳戶的授權簽署者
- B. 對帳戶擁有法定控股權的人
- C. 通常透過所有權或其他方式對帳戶中的資金擁有最終控制權的人
- D. 是該帳戶的最終資金來源且其財富來源應受到盡職調查的人

Answer: (SHOW ANSWER)

According to the Wolfsberg Anti-Money Laundering Principles for Private Banking, the beneficial owners of a private banking account are those who generally have ultimate control over the funds in the account and those who are the ultimate source of funds for the account and whose source of wealth should be subject to due diligence¹. These two criteria are meant to ensure that the bank knows who is ultimately behind the account and where the funds come from, in order to prevent the use of the bank for money laundering or other criminal purposes. Authorized signers on the account or those who have

legal title to a controlling share interest in the customer are not necessarily the beneficial owners, as they may act on behalf of others or have limited influence over the account.

1: Wolfsberg Anti-Money Laundering Principles for Private Banking (2012), Section 1.3.1 and 1.3.2, 1
Reference:<https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/wolfsberg-standards/10.%20Wolfsberg-Private-Banking-Principles-May-2012.pdf>(2)

NEW QUESTION: 263

專家認為，防止金融機構洗錢最有效的方法是什麼？

- A. 確保交易監控系統能辨識恐怖主義融資
- B. 收集有關受益所有人和外國客戶的信息
- C. 制定政策，禁止接受旨在資助恐怖主義的資金
- D. 實施完善的客戶盡職調查計劃

Answer: ([SHOW ANSWER](#))

Implementing a sound customer due diligence (CDD) program is the most effective way to prevent money laundering through financial institutions, according to experts. CDD is the process of identifying and verifying the identity of customers and assessing their risk profile, source of funds, and expected activity.

CDD helps financial institutions to detect and prevent money laundering by enabling them to know their customers, monitor their transactions, and report any suspicious or unusual behavior. CDD is also a key requirement of the international standards and best practices for anti-money laundering and combating the financing of terrorism (AML/CFT), such as the Financial Action Task Force (FATF) Recommendations and the Basel Committee on Banking Supervision (BCBS) Guidelines.

The other options are not as effective as CDD, as they are either too narrow or too broad in scope. Ensuring that transaction monitoring systems can identify terrorist financing is important, but it does not address the broader issue of money laundering, which may involve other types of criminal proceeds or activities.

Collecting information on beneficial owners and foreign customers is a part of CDD, but it is not sufficient by itself, as it does not cover the risk assessment and ongoing monitoring aspects of CDD. Instituting a policy prohibiting the acceptance of funds intended for terrorist financing is a good practice, but it is not a preventive measure, as it relies on the assumption that the funds are already identified as such, which may not be the case.

Customer Due Diligence - FATF-GAFI.ORG

Sound management of risks related to money laundering and financing of terrorism - Bank for International Settlements CAMS Study Guide 6th Edition, page 36-37.

NEW QUESTION: 264

對於美國 (US) 制裁法具有管轄權的交易，哪些內容必須在實質上屬實？

- A. 交易被追蹤到非法收益
- B. 交易由美國人處理
- C. 交易中刪除了受益所有人資訊
- D. 交易認定為外國貪腐所得

Answer: (SHOW ANSWER)

Reference:https://www.treasury.gov/resource-center/faqs/Sanctions/Documents/faq_all.html

"Who must comply with OFAC regulations? U.S. persons must comply with OFAC regulations, including all U.S. citizens and permanent resident aliens regardless of where they are located, all persons and entities within the United States, all U.S. incorporated entities and their foreign branches. In the cases of certain programs, foreign subsidiaries owned or controlled by U.S. companies also must comply. Certain programs also require foreign persons in possession of U.S.-origin goods. please refer to:<https://home.treasury.gov/policy-issues/financial-sanctions/frequently-asked-questions/ofac-consolidated-frequently-asked-questions>

NEW QUESTION: 265

一名未來的反洗錢官員將受到位於同一國家不同城市、規模和構成相似的銀行上游代理機構的高度推薦。該銀行有興趣僱用此人。董事會下一步該採取什麼步驟？

- A. 進行徹底的背景調口
- B. 與其監管機構協商以確定是否適合僱用此人
- C. 根據通訊員的推薦僱用個人
- D. 試用期僱用個人，以便機構可以確定個人是否有足口的經驗和能力

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) study guide, one of the best practices for hiring an AML officer is to do a thorough background check, including verifying the candidate's credentials, qualifications, references, and reputation¹. This is because the AML officer plays a crucial role in ensuring the compliance and integrity of the financial institution, and therefore must have the necessary skills, knowledge, experience, and ethics to perform the job effectively and professionally. A background check can also help to identify any potential conflicts of interest, criminal records, or regulatory sanctions that may affect the candidate's suitability for the position¹. The other options are incorrect because:

- * B. Confering with the regulatory agency may not be necessary or appropriate, as the hiring decision is ultimately the responsibility of the financial institution, and the regulatory agency may not have any specific or relevant information or guidance on the candidate².
- * C. Hiring the individual, relying on the recommendation of the correspondent, may not be sufficient or prudent, as the correspondent may have different standards, expectations, or interests than the financial institution, and may not have conducted a comprehensive or objective assessment of the candidate³.
- * D. Hiring the individual on a probationary basis may not be feasible or fair, as the AML officer role requires a high level of trust, authority, and responsibility, and the financial institution may not be able to evaluate the candidate's performance or potential in a short period of time⁴.

1: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 147

2: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 148

3: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 147

4: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 148

NEW QUESTION: 266

與信託和公司服務提供者相關的洗錢潛在指標包括：

(選兩個)

- A. 在有嚴格保密法的司法管轄區使用法人。
- B. 將現金存款存入第三人帳戶。
- C. 無合法目的的跨司法管轄區電匯。
- D. 口生租金收入以使非法資金合法化。
- E. 頻繁向銀行帳戶存款或提款。

Answer: (SHOW ANSWER)

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: 267

哪種方法可以確保交易監控系統的成功實施？

- A. 一旦交易監控系統規則和參數被證明準確，就應非常小心地盡量減少對這些規則和參數的更改
- B. 在交易監控系統上線之前，在開發的關鍵步驟和使用後驗收測試中執行系統整合測試
- C. 實施第三方交易監控軟體，小心不要調整預編程規則和警報閾值
- D. 確保交易監控系統的規則和參數的所有檢核在系統運行後使用實際的即時數據

Answer: (SHOW ANSWER)

A transaction monitoring system (TMS) is a tool that helps financial institutions detect and report suspicious activities related to money laundering, terrorist financing, and other financial crimes. A TMS needs to be implemented carefully and effectively to ensure its accuracy, reliability, and compliance with regulatory requirements.

One of the best practices for implementing a TMS is to perform systems integration testing (SIT) at key steps of development and user acceptance testing (UAT) prior to going live with the TMS. SIT is a process of verifying that the TMS can interact with other systems and data sources correctly and efficiently. UAT is a process of validating that the TMS meets the functional and operational expectations of the end-users and stakeholders.

By conducting SIT and UAT, the financial institution can identify and resolve any issues or defects in the TMS before it is deployed in the production environment. This can help avoid potential problems such as data quality issues, false positives, false negatives, system errors, performance issues, and regulatory breaches.

Performing SIT and UAT can also help ensure that the TMS is aligned with the financial institution's risk assessment, policies, procedures, and controls.

References:

Step 1 - Transaction Monitoring Implementation Best Practices

NEW QUESTION: 268

應如何處理風險相關問題以確保三道防線模式的有效性？

- A. 盡可能讓高階管理層直接處理與風險相關的問題，因為他們最終要對組織的整體風險管理策略負責
- B. 確保第二線審口、監控並根據需要向高階管理層報告風險相關問題，同時保持第三線的獨立監督
- C. 將一些與風險相關的問題委託給第一線，以避免第二線負擔過重，並確保營運效率
- D. 將與風險相關的監督職責分配給第三線，以提供獨立審口，並透過避免第一和第二線的利益衝突來更有效地解決問題

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 269

美國愛國者法案要求美國金融機構從持有代理帳口的非美國銀行收集某些資訊。非美國銀行必須向其美國代理機構提供哪兩項資訊才能遵守此要求？（選兩個）

- A. 該銀行開設帳口的所有空殼銀行的名稱和地址
- B. 所有擁有銀行 25% 或以上股份的所有受益所有人的姓名和地址
- C. 及時通知使用代理帳口的任何客口偵測到的任何可疑活動
- D. 被授權接受銀行法律程序服務的美國人的姓名和地址

Answer: ([SHOW ANSWER](#))

According to Section 313 of the USA PATRIOT Act, U.S. financial institutions are prohibited from maintaining correspondent accounts for foreign shell banks, which are banks that have no physical presence in any country and are not affiliated with a regulated financial group. Therefore, a non-U.S. bank must provide the name and address of all shell banks that it maintains accounts for, if any, to its U.S. correspondent. This is to ensure that the U.S. financial institution does not indirectly provide services to shell banks, which pose a high risk of money laundering and terrorist financing.

According to Section 319 (b) of the USA PATRIOT Act, U.S. financial institutions that provide a correspondent account to a foreign bank must maintain records of the owners of the foreign bank and the name and address of a U.S. person who is authorized to receive service of legal process for records regarding the correspondent account. This is to facilitate the access of U.S. law enforcement authorities to information related to the correspondent account in case of an investigation or a subpoena.

The other two options, B and C, are not required by the USA PATRIOT Act, although they may be part of the due diligence or enhanced due diligence procedures that U.S. financial institutions apply to their foreign correspondent accounts, as per Section 312 of the USA PATRIOT Act.

USA PATRIOT Act

FACT SHEET for Section 312 of the USA PATRIOT Act Final Regulation and Notice of Proposed Rulemaking US PATRIOT ACT CAMS Exam: USA PATRIOT Act Requirements for Opening a Correspondent Account Reference: <https://www.sec.gov/about/offices/ocie/amlsourcetool.htm>

NEW QUESTION: 270

哪一種情況表示律師可能進行洗錢活動？

- A. 某律師的信託帳戶定期接收來自高風險國家的未知匯款人的電匯，並立即將收到的相同金額的資金轉入低風險國家的已知受益人的帳戶。
- B. 位於高風險國家的律師將其公司從其信託帳戶簽發的銀行匯票存入位於低風險國家的另一位律師的信託帳戶，以提供法律服務
- C. 某律師信託帳戶從受監管的保險公司收到大額電匯，並立即將相同金額的資金轉入受益人位於低風險國家的銀行帳戶。
- D. 一位律師的信託帳戶從想要購買一處房產的客戶收到一筆大額電匯存款，然後將相同金額轉入房產賣方的律師信託帳戶。

Answer: (SHOW ANSWER)

Lawyers' trust accounts are commonly exploited for money laundering, particularly for layering and integration stages.

Option A (Correct): Receiving and immediately forwarding wire transfers from unknown sources in a high-risk jurisdiction is a strong red flag for money laundering.

Option B (Incorrect): While legal professionals in high-risk countries require monitoring, the transaction itself is not necessarily suspicious.

Option C (Incorrect): Insurance company payments are typically traceable, reducing money laundering risk.

Option D (Incorrect): Lawyers handling real estate transactions is normal unless the deal structure is highly irregular.

Red Flags for Money Laundering in Legal Professions:

Use of client accounts to receive and distribute funds without legal purpose.

Multiple transactions involving unrelated third parties.

Legal services that do not align with the nature of payments received.

Best Practices for AML in Legal Professions:

Conduct enhanced due diligence (EDD) on high-risk transactions.

Monitor transactions involving high-risk jurisdictions.

File Suspicious Activity Reports (SARs) for unexplained transactions.

Reference:

FATF Report on the Misuse of Legal Professionals for ML/TF

6th EU AML Directive (6AMLD) on DNFBPs & Legal Professionals

Wolfsberg Group Guidance on AML for Lawyers & Law Firms

NEW QUESTION: 271

哪些要素可以在開設新帳戶期間觸發現有關係的審計？（選兩個）

- A. 定期檢查資金流向
- B. 最近對客戶的負面媒體
- C. 姓名篩選的誤報結果
- D. 來自高風險司法管轄區的傳入轉賬
- E. 預計總收入減少

Answer: (SHOW ANSWER)

According to the Certified Anti-Money Laundering Specialist (CAMS) Sixth Edition manual, elements that can trigger a review of the existing relationship during the opening of a new account include recent adverse media on the client (page 60) and incoming transfers from high-risk jurisdictions (page 61). The other elements listed, such as regular checks on the flow of funds, a false positive result for name screening, and an estimated total income decrease, are not triggers for a review.

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NEW QUESTION: 272

根據金融行動特別工作小組的建議，一國的金融情報機構在防範洗錢方面扮演什麼角色？

- A. 監控每月的經濟公共統計數據
- B. 口生貨幣交易報告發送給中央銀行
- C. 透過口生可疑活動報告協助追蹤犯罪活動
- D. 分析可疑活動報告的數據

Answer: (SHOW ANSWER)

According to the Financial Action Task Force (FATF), a country's financial intelligence unit (FIU) plays a key role in safeguarding against money laundering and terrorist financing. One of the main functions of an FIU is to receive, analyze, and disseminate suspicious activity reports (SARs) submitted by financial institutions and other obligated entities. By analyzing SARs, an FIU can identify trends, patterns, and other intelligence related to money laundering and terrorist financing, which can assist in the pursuit of criminal activity. While an FIU may also generate currency transaction reports (CTRs) or other types of financial reports, these functions are not specific to safeguarding against money laundering and terrorist financing.

Similarly, while monitoring monthly public statistics on the economy may be an important aspect of macroeconomic analysis, it is not a specific role of an FIU in safeguarding against money laundering and terrorist financing.

NEW QUESTION: 273

根據金融行動特別工作組 (FATF) 的方法，哪些情況需要金融機構(FI) 考慮提交可疑活動報告 (SAR)？

- A. 金融機構無法驗證相關的客戶盡職調查 (CDD) 文件。
- B. 交易的受益者是政治公眾人物 (PEP)。
- C. FI 將付款人標識為貴金屬或寶石的交易商。
- D. 交易涉及從加密貨幣到法定貨幣的資金兌換。

Answer: (SHOW ANSWER)

A Suspicious Activity Report (SAR) is required when a financial institution detects activity that raises suspicion of money laundering, terrorist financing, or fraud.

Option A (Correct): Inability to verify customer identification documents is a red flag for potential financial crime and may require reporting to the Financial Intelligence Unit (FIU).

Option B (Incorrect): PEPs require enhanced due diligence (EDD), but their involvement alone does not automatically trigger a SAR.

Option C (Incorrect): Dealers in precious metals/stones are high-risk, but being in this industry alone does not warrant an automatic SAR.

Option D (Incorrect): Crypto-to-fiat transactions are not inherently suspicious, but they require monitoring for unusual activity.

Key SAR Filing Triggers:

Transactions that do not match the customer's expected activity.

Incomplete, fraudulent, or unverifiable customer identification.

Use of shell companies or unusual intermediaries.

Large or structured transactions with no apparent legitimate purpose.

Best Practices for SAR Compliance:

Implement robust customer due diligence (CDD) processes.

Monitor transaction behavior against expected patterns.

Follow jurisdictional SAR filing deadlines to avoid penalties.

Reference:

FATF Recommendation 20 (Reporting Suspicious Transactions)

6th EU AML Directive (6AMLD) on Suspicious Transactions Reporting

FinCEN SAR Filing Guidelines

NEW QUESTION: 274

機構反洗錢計畫的最終責任由誰承擔？

A. 指定的反洗錢合規官

B. 該機構的董事會

C. 與客戶聯繫的所有員工

D. 政府監管機構正在審閱反洗錢計劃

Answer: (SHOW ANSWER)

According to the CAMS Certification Package - 6th Edition¹, the ultimate responsibility for an institution's anti-money laundering program rests with the institution's board of directors. The board of directors is responsible for creating a culture of compliance, approving the AML policies and procedures, appointing the AML compliance officer, overseeing the implementation and effectiveness of the AML program, and ensuring adequate resources and training are provided to the staff. The board of directors is also accountable for any deficiencies or violations of the AML program and must take corrective actions when necessary.

CAMS Certification Package - 6th Edition | ACAMS

NEW QUESTION: 275

哪些危險訊號與透過資本市場洗錢最相關？

- A. 某種低價證券的投資者需求突然激增，價格上漲。
- B. 某種證券的交易量和價格呈現穩定下降的交易模式。
- C. 一家公司發現對電子交易基金的需求出現意外成長。
- D. 交易客戶持有集中在一個特定新興市場的證券投資組合。

Answer: (SHOW ANSWER)

Money laundering through capital markets often involves pump-and-dump schemes, wash trading, and layering funds through rapid trading activity.

Option A (Correct): A sudden spike in demand for a low-priced security is a red flag for pump-and-dump schemes, where criminals manipulate the market to inflate stock prices artificially before selling off shares for a profit.

Option B (Incorrect): A gradual decline in trading volume and price does not indicate suspicious activity related to money laundering.

Option C (Incorrect): An increase in demand for ETFs is common and not necessarily linked to money laundering.

Option D (Incorrect): Holding securities in one specific emerging market may indicate a geographic investment strategy, not necessarily money laundering.

Common Money Laundering Typologies in Capital Markets:

Pump-and-Dump Schemes - Fraudulently inflating stock prices to cash out illicit funds.

Wash Trading - Conducting self-trades to create an illusion of high market activity.

Layering Funds Through Rapid Trading - Engaging in frequent buy-and-sell orders to obfuscate the origin of funds.

Best Practices for AML in Capital Markets:

Monitor unusual trading volume and price fluctuations.

Use AI-driven surveillance systems to detect manipulative behavior.

Investigate transactions involving offshore brokers or shell entities.

Reference:

FATF Report on Money Laundering in Capital Markets

SEC and FINRA Guidance on Market Manipulation Risks

Wolfsberg Group Principles for Capital Markets AML Compliance

NEW QUESTION: 276

一家美國貨幣服務企業 (MSB) 的新反洗錢官員正在起草有關需要進一步審口的活動類型的程序。應該包括哪些？（選兩個）

- A. 客戶在同一天造訪 MSB 的多個分行以進行國際轉帳。
- B. 客戶使用政府頒發的身份證明在同一天使用借記卡購買了多張總計超過 10,000 美元的匯票。
- C. 客戶向居住在遭受口亂的高風險司法管轄區的家庭成員匯款。
- D. 一位客戶以 250 美元的價格購買多張匯票，總計 2,000 美元。
- E. 顧客嘗試每天多次購買低於 3,000 美元的現金匯票。

Answer: (SHOW ANSWER)

A customer visiting multiple branches of the MSB on the same day in order to transfer funds internationally is a potential indicator of structuring, which is a technique used by money launderers to avoid reporting thresholds or detection by authorities. A customer attempting to buy money orders under \$3,000 USD in cash multiple times a day is also a possible sign of structuring, as well as an attempt to evade the identification and recordkeeping requirements for MSBs. Both scenarios should be included in the procedures for further review by the AML Officer.

BSA/AML Risk Assessment for Money Services Businesses (MSBs), section "Risk Factors", sub-section

"Structuring": "Structuring is the practice of conducting financial transactions in a specific pattern calculated to avoid the creation of certain records and reports required by the BSA and/or 31 CFR Chapter X.

Structuring is illegal and is often indicative of money laundering or other illicit activity." Money Services Business (MSB) - AML Compliance Guide, section "AML Compliance Requirements for MSBs", sub-section "Identification and Recordkeeping": "MSBs must verify the identity of any person who conducts a transaction of \$3,000 or more. They must also keep records of the transaction, including the name, address, date of birth, and identification number of the customer, as well as the amount, date, and method of payment."

NEW QUESTION: 277

一位新客戶剛加入一家證券公司。幾週後，一些不尋常的交易模式被標記出來，合規官最關心哪一種模式？

- A. 客戶透過交易帳戶從事流動性或高價證券的大額交易。
- B. 顧客重複買賣低價低成交量的證券。
- C. 客戶從關聯方收到許多轉入交易帳戶的電匯。
- D. 客戶每週以小增量累積低交易量櫃檯的證券。

Answer: (SHOW ANSWER)

The most concerning trading pattern for a compliance officer when a new customer has been onboarded in a securities firm is the customer accumulating securities of a low volume counter in small increments on a weekly basis. This type of behavior could indicate that the customer is attempting to obscure their identity or the true purpose of their trading activity, which can be indicative of money laundering or other suspicious activity. (CAMS Manual, 6th Edition, Page 170).

NEW QUESTION: 278

執法機構正在審閱金融機構提交的可疑交易報告 (STR)，以確定客戶帳戶上是否有可疑活動。隨後，該機構要求提供更多資訊。

執法機構可能會要求該機構提供哪些支持文件以促進其調查？

- A. 先前針對同一客戶提交的 STR
- B. 開戶文件和帳戶對帳單
- C. 發送給客戶的促銷資料副本
- D. 機構 STR 政策和程序的副本

Answer: (SHOW ANSWER)

account opening documents and account statements are examples of supporting documentation that can help the law enforcement agency to verify the identity, profile, and activity of the customer involved in the suspicious transaction. These documents can provide useful information such as the customer's name, address, date of birth, identification number, occupation, source of funds, transaction history, and beneficiaries. These documents can also help to establish the baseline of normal and expected activity for the customer, and to identify any deviations or anomalies that may indicate money laundering, fraud, or other criminal activities.

Suspicious Activity Report Supporting Documentation, section "What Constitutes Supporting Documentation", paragraph 2: "Supporting documentation may include, for example, transaction records, new account information, tape recordings, e-mail messages, and correspondence."

Documentation Requirements: Suspicious Activity Report Supporting Documentation, section "SARs Documentation Requirements", paragraph 2: "Keep all documents with evidence of the background, the purpose of the transactions, the trigger, the investigation carried out, and all findings and conclusions." BSA/AML Manual, section "Assessing the BSA/AML Compliance Program - BSA Compliance Officer", paragraph 3: "The BSA compliance officer is responsible for ensuring that the bank's BSA/AML compliance program is implemented effectively, including timely updates in response to changes in regulations or business activities, and for managing all aspects of the BSA/AML compliance program. The BSA compliance officer is also responsible for ensuring that the bank's BSA/AML compliance program is communicated to all personnel and that adequate training is provided to appropriate personnel."

NEW QUESTION: 279

為了在對金融機構的任何員工進行口部調口時保護調口資料不被披露，該金融機構的法律顧問應該_____？

- A. 請公司正式授權進行調口。如果可能的話，此類授權應由董事會或審計委員會授予
- B. 拒口向執法部門提供任何記錄或文件，因為銀行對其銀行客口擁有客口特權
- C. 讓銀行聘請所有合約調口員進行口部調口。這樣，法律部門就不是訴訟的一方，可以保持獨立
- D. 不將文件或文件標記為特權和機密：律師委託人特權和/或工作口品。這些標記只會鼓勵執法

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) study guide, one of the best practices for conducting an internal investigation is to request formal company authorization to conduct the investigation. Such authorization should be granted, if possible, by the board of directors or audit committee, as this will help to establish the independence and legitimacy of the investigation, as well as the protection of the attorney-client privilege and the work product doctrine¹. The other options are incorrect because:

- B). Refusing to provide any records or documents to law enforcement may be seen as obstructing justice or violating regulatory obligations, and may also result in the loss of the privilege or the imposition of sanctions or penalties²³.
- C). Letting the bank hire any and all contract investigators may compromise the quality and integrity of the investigation, as well as the protection of the privilege or the work product doctrine, as the

investigators may not be properly supervised or instructed by legal counsel, or may not be covered by the Kovel doctrine⁴⁵.

D). Not marking files or documents with privileged and confidential: attorney-client privilege and/or work-product may undermine the claim of the privilege or the work product doctrine, as it may indicate that the materials were not prepared for the purpose of seeking or providing legal advice or in anticipation of litigation, or that they were not intended to be kept confidential⁶⁷.

1: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 150

2: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 151

3: Perkins Coie, Protecting Internal Investigation Materials From Disclosure, Updates, August 10, 2020

4: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 150

5: Eversheds Sutherland, Legal privilege of corporate internal investigations under US law - 2019 caselaw update, JDSupra, December 20, 2019

6: ACAMS, CAMS Certification Package - 6th Edition, Chapter 5, page 150

7: Norton Rose Fulbright, Internal investigations: when does privilege apply?, Global law firm, September 11, 2018

NEW QUESTION: 280

當金融機構被要求向執法機構提供與資助恐怖主義有關的數據和資訊時，應協助：

- A. 可以因洩密為由而拒口。
- B. 不能以銀行保密為由拒口。
- C. 不能以洩密為由拒口。
- D. 可因銀行保密原因被拒口。

Answer: (SHOW ANSWER)

When a financial institution is requested to provide data and information to a law enforcement agency for matters related to the financing of terrorism, assistance cannot be refused on the grounds of tipping-off.

Tipping-off refers to disclosing to a customer or any third party that a suspicious activity report (SAR) has been filed. However, in this specific context, the obligation to provide information to law enforcement takes precedence over any concerns related to tipping-off. Financial institutions must cooperate fully with law enforcement agencies in such cases to combat money laundering and terrorist financing¹².

References:

31 CFR 1010.520 (a) (2)

FinCEN: Fact Sheet on the Rapid Response Program (RRP)

FinCEN.gov

Federal Financial Institutions Examination Council (FFIEC) BSA/AML Examination Manual

NEW QUESTION: 281

當監管機構在洗錢調查中需要國際援助時，此類援助通常透過以下方式獲得：

- A. 根據埃格蒙特準則提交請求。

- B. 向相應監理機關提交海外援助請求。
- C. 聯絡金融行動特別工作小組、經濟合作口發展組織或其他國際組織並尋求他們的介入。
- D. 與金融機構的合規主管溝通。

Answer: ([SHOW ANSWER](#))

The Egmont Group of Financial Intelligence Units (FIUs) is a global network of FIUs that facilitates and promotes the exchange of information, knowledge, and cooperation among its members to combat money laundering, terrorist financing, and other financial crimes¹. The Egmont Group has developed operational guidance for international cooperation and information exchange among FIUs, which includes channels, procedures, and forms for making and receiving requests². Filing a request under Egmont guidelines is therefore a common and effective way for a regulatory body to obtain international assistance in a money laundering inquiry, as it ensures that the request is made through the appropriate and secure channel, and that it meets the standards and expectations of the requested FIU.

1: Home - Egmont Group

2: EGMONT GROUP OF FINANCIAL INTELLIGENCE UNITS OPERATIONAL GUIDANCE FOR ...

NEW QUESTION: 282

根據金融行動特別工作小組 (FATF) 建議²，當涉及包括買賣房地口的客口交易時，房地口專業人士需要應用哪些客口盡職調口 (CDD) 措施？(選兩個)

- A. 識別並驗證客口身份
- B. 所有相關交易均需事先獲得高階經理人的批准
- C. 對客口進行不利的媒體搜索
- D. 了解業務關係的目的

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 283

在實施合理的基於風險的方法時，房地口經紀人應將哪三項納入評估公司潛在洗錢和恐怖主義融資風險的標準中？

- A. 信用風險
- B. 客口風險
- C. 交易風險
- D. 地理風險

Answer: ([SHOW ANSWER](#))

According to the Wolfsberg Principles on Correspondent Banking¹, an institution should consider the following three elements in its enhanced due diligence process for higher risk respondent bank customers:

* The quality of the respondent's AML and client identification controls: The correspondent should assess the adequacy and effectiveness of the respondent's AML policies, procedures, and systems, as well as its compliance with applicable AML laws and regulations. The correspondent should also verify

that the respondent has implemented appropriate customer identification and verification measures, and that it maintains sufficient records of its customers and transactions.

* A risk-based determination as to whether or not the respondent is a shell bank: The correspondent should ensure that the respondent is not a shell bank, which is defined as a bank that has no physical presence in any country and is not affiliated with a regulated financial group. The correspondent should also avoid establishing or maintaining relationships with banks that are known to allow their accounts to be used by shell banks.

* Whether a Politically Exposed Person (PEP) has an interest or management role in the respondent: The correspondent should identify and assess the potential risks associated with any PEPs who have an ownership or management interest in the respondent, or who are customers of the respondent. The correspondent should apply enhanced scrutiny and monitoring to such relationships, and obtain senior management approval before establishing or continuing them.

Wolfsberg Correspondent Banking Principles 2022 by the Wolfsberg Group, October 2022.

Reference:<http://www.fatf-gafi.org/media/fatf/documents/reports/RBA%20Guidance%20for%20Real%20Estate%20Agents.pdf>(page 20, second paragraph)

NEW QUESTION: 284

FATF 的 40 個建議涵蓋哪三個領域？選出 3 個答案

- A. 國際合作
- B. 上游犯罪的規定性句子
- C. 金融體系及其監管
- D. 刑事司法系統

Answer: ([SHOW ANSWER](#))

The 40 Recommendations provide a complete set of countermeasures against money laundering and terrorist financing, covering

- * the identification of risks and development of appropriate policies;
- * the criminal justice system and law enforcement;
- * the financial system and its regulation;
- * the transparency of legal persons and arrangements; and
- * international cooperation.

NEW QUESTION: 285

誰負責溝通和加強既定的反洗錢合規文化和計劃？

- A. 業務線
- B. 高階管理層
- C. 董事會
- D. 合規官

Answer: ([SHOW ANSWER](#))

The compliance officer is the person who has the day-to-day responsibility of communicating and reinforcing the established anti-money laundering (AML) compliance culture and program within the

organization. The compliance officer is also responsible for overseeing the implementation, maintenance, and improvement of the AML policies, procedures, controls, and training. The compliance officer should have sufficient authority, independence, and resources to perform their duties effectively and report to senior management and the board of directors on the status and effectiveness of the AML program.

- 1, Chapter 4: Designing and Implementing an AML Compliance Program
- 2, FFIEC BSA/AML Examination Manual, Compliance Program - Overview
- 3, FinCEN Advisory, Guidance on Promoting a Culture of Compliance

NEW QUESTION: 286

組織的自動監控系統可以辨識客戶活動的大幅波動。審計結果表明，合規官員得知，當活動長期持續異常時，系統不會產生警報。目前，該組織正在評估新的警報場景，試圖解決此問題。哪種場景有助於緩解這項弱點？

- A. 同級
- B. 收入
- C. 映射
- D. 線下

Answer: (SHOW ANSWER)

The correct answer is C, as mapping scenarios are helpful in mitigating the weakness of not generating alerts when activity is consistently abnormal over a long period of time. Mapping scenarios are used to compare a customer's activity with their expected activity based on their profile, risk rating, or historical behavior¹. By using mapping scenarios, the organization can identify customers whose activity deviates significantly from their normal or expected patterns, and flag them for further investigation. Mapping scenarios can also help detect changes in customer behavior over time, and alert the organization of any potential money laundering or terrorist financing risks.

1: AML Scenarios: Transaction Monitoring Challenges - Unit21, page 1.

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NEW QUESTION: 287

根據金融行動特別工作組的口法，作為其風險評估的一部分，信託和公司服務提供者在建立和管理信託時必須了解哪些重要數據和資訊？（選兩個）

- A. 結構中的職責與權限
- B. 信託的管理架構

- C. 結構中的資金來源
- D. 結構背後的一般用途
- E. 信託業務的一般性質

Answer: ([SHOW ANSWER](#))

Here is the exact information from the Financial Action Task Force (FATF) Guidance for a Risk-Based Approach for Trust and Company Service Providers:

"Understanding the management and ownership structure of a trust is crucial in assessing the ML/TF risk it poses. This includes the identity of all settlors, trustees and beneficiaries, and their respective roles and responsibilities, as well as the nature and purpose of the trust."

"TCSPs should obtain and maintain up-to-date information on the purpose and intended nature of the business relationship, the source of funds and wealth, and where relevant, the source of funds or wealth of the settlor and beneficiaries." Based on this information, the correct answers are A and D. Trust and Company Service Providers must understand the responsibility and authority in the structure, as well as the general purpose behind the structure in order to assess the overall risk of the trust and ensure that any transactions with the trust are legitimate.

NEW QUESTION: 288

關於歐盟反洗錢指令，哪兩項敘述是正確的？（選兩個）

- A. 適用於歐盟成員國
- B. 它們要求成員國頒布法律和/或法規以遵守指令
- C. 它們為會員國口的金融機構提出了不具約束力的最佳實踐
- D. 具有域外影響，適用於與成員國有外交關係的國家

Answer: ([SHOW ANSWER](#))

The European Union Money Laundering Directives (AMLDs) are issued periodically by the European Parliament to prevent money laundering and terrorist financing and establish a consistent regulatory environment across the EU¹. They apply to all member states of the European Union and require them to enact laws and/or regulations to comply with the directives². The directives are legally binding and set forth minimum standards and obligations for financial institutions and other entities within the member states³. The directives do not set forth non-binding best practices, but rather harmonize the AML/CFT rules and procedures across the EU⁴. The directives do not have extraterritorial impact and do not apply to states that have diplomatic relations with member states, unless they are part of the European Economic Area (EEA) or have equivalent AML/CFT regimes⁵.

1: Guide to EU Anti Money Laundering Directives (AMLD) - ComplyAdvantage 2: Directive - 2015/849 - EN - Fourth Anti-Money Laundering Directive - EUR-Lex 3: EU context of anti-money laundering and countering the financing of terrorism - European Commission 4: EU Anti-Money Laundering Directives (AMLD) | LSEG - Refinitiv 5: Anti-money laundering and countering the financing of terrorism legislative package - European Commission Reference:<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32015L0849&from=FR>

NEW QUESTION: 289

反洗錢合規官收到一份包含多項調查結果的獨立審計報告。

對該報告的適當回應包括：

- A. 重新執行調口結果中提到的控制測試以確認稽核結果。
- B. 將審口行動計畫的責任分配給董事會。
- C. 為審計團隊起草詳細的行動計劃，以消除調口結果。
- D. 根據調口結果的根本原因分析來確定補救措施。

Answer: (SHOW ANSWER)

AML audit findings must be analyzed and addressed through remedial actions based on root cause analysis.

Option D (Correct): Root cause analysis helps develop effective corrective measures to prevent recurring AML deficiencies.

Option A (Incorrect): Retesting controls may be useful, but addressing deficiencies is more critical.

Option B (Incorrect): While the board oversees compliance, the responsibility for implementing fixes lies with AML teams.

Option C (Incorrect): Audit teams provide findings but do not execute corrective actions.

Best Practices for Addressing AML Audit Findings:

Identify the root cause of AML control failures.

Develop risk-based remediation plans.

Implement and monitor corrective actions.

Reference:

FATF Recommendation 18 (AML Internal Controls & Audit)

Basel Committee's Guidelines on AML Audits

Wolfsberg Group Principles for AML Risk Management

Final Thoughts:

Suspicious stock price movements can indicate market manipulation linked to money laundering.

EU AML and GDPR regulations enforce strict data minimization and AI compliance requirements.

Bearer shares, nominee directors, and tax-haven corporations increase money laundering risks.

AML audit findings should be addressed through root cause analysis and corrective actions.

NEW QUESTION: 290

當根據監管機構的同意令或類似行動時，組織中誰最終負責糾正任何違反反洗錢/反恐怖主義融資法律法規的行為？

- A. 營運長 (COO)
- B. 董事會
- C. 指定反洗錢合規官
- D. 執行長 (CEO)

Answer: (SHOW ANSWER)

The Board of Directors holds ultimate responsibility for AML/CFT compliance and governance.

Option B (Correct): The Board must oversee, approve, and ensure AML programs are effective.

Option A (Incorrect): The COO manages operations, but does not hold ultimate accountability.

Option C (Incorrect): While the AML officer executes compliance programs, the Board provides oversight.

Option D (Incorrect): The CEO is responsible for strategy, but AML failures fall under Board accountability.

Reference: Basel Committee's Corporate Governance Principles for Banks, FATF Recommendation 1 (Risk-Based Approach), U.S. OCC AML Compliance Guidelines.

NEW QUESTION: 291

一家根據外國法律成立且位於美國境外的銀行與一家美國銀行保持代理銀行關係，為其客戶處理美元金融交易。

根據 2001 年美國愛國者法案，所有美國銀行和證券經紀交易商必須獲得與其開展業務的所有非美國外國銀行客戶的簽名證明。

2001 年美國愛國者法案要求外國銀行向美國銀行證明哪些資訊？（選擇三項）

- A. 外國銀行的所有權詳細資料。
- B. 外國銀行不會允許政治公眾人物 (PEP) 間接使用代理銀行帳戶。
- C. 外國銀行擁有實體存在的司法管轄區。
- D. 外國銀行的業務將僅限於其註冊成立的國家。
- E. 外國銀行不會允許空殼銀行間接使用代理銀行帳戶。

Answer: (SHOW ANSWER)

The USA PATRIOT Act Section 313 & 319(b) places strict requirements on foreign correspondent banking relationships to prevent money laundering.

* Option A (Correct): The foreign bank must disclose its ownership structure to identify ultimate beneficial owners (UBOs).

* Option C (Correct): The foreign bank must certify that it maintains a physical presence in a regulated jurisdiction.

* Option E (Correct): The foreign bank must not allow shell banks to use its U.S. correspondent accounts.

Why Other Options Are Incorrect:

* Option B (Incorrect): The certification does not specifically exclude PEPs, but PEPs require enhanced due diligence (EDD).

* Option D (Incorrect): The foreign bank may operate in multiple jurisdictions, but it must be regulated where it has a presence.

Key Compliance Measures for Correspondent Banking:

- * Conduct EDD on foreign bank relationships.
- * Ensure correspondent banks do not facilitate shell banks.
- * Monitor transactions for money laundering and terrorist financing risks.

Reference:

USA PATRIOT Act Section 313 & 319(b) (Foreign Correspondent Banking Rules) FATF Recommendation 13 (Correspondent Banking Due Diligence) Wolfsberg Group Guidance on Correspondent Banking Risk Management

NEW QUESTION: 292

一個國家的金融情報機構 (FIU) 的主要職責包括：(選擇兩個)

- A. 促進公共和私營部門之間的資訊交流。
- B. 與執法機構、金融機構和其他利害關係人合作，發現和防止非法金融活動。
- C. 制定有關金融機構運作的立法。
- D. 對金融機構進行檢口，以確保遵守反洗錢法規。
- E. 從事向公私部門提供金融服務，包括銀行和投資活動。

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 293

哪一種資助恐怖主義的方法涉及偽造交易相關文件？

- A. 賄賂
- B. 黑市比索兌換
- C. 基於貿易的洗錢
- D. 非正式價口轉移系統

Answer: ([SHOW ANSWER](#))

Trade-based money laundering (TBML) is a method to finance terrorism that involves falsifying transaction-related documents, such as invoices, contracts, bills of lading, or customs declarations, to conceal the origin, destination, value, or purpose of illicit funds. TBML can be used to move money, goods, or services to or from sanctioned or high-risk jurisdictions, to evade taxes, duties, or currency controls, to launder proceeds of crime, or to support terrorist activities. TBML can involve over- or under-invoicing, over- or under-shipping, multiple-invoicing, or falsely describing goods or services. TBML can also be linked to other methods of money laundering or terrorist financing, such as bribery, black market peso exchange, or informal value transfer systems.

ACAMS CAMS Certification Video Training Course, Module 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Lesson 4: Trade-Based Money Laundering Money Laundering and Terrorist Financing Related to Counterfeiting of Currency, Financial Action Task Force (FATF), page 28 Tracing terrorist finances, INTERPOL

NEW QUESTION: 294

金融機構 (FI) 員工的哪些異常或可疑活動需要額外調口和審口？

- A. 儘管有應計假期，員工仍避免定期休假。
- B. 員工協助揭露的最終受益人進行交易。
- C. 員工過著量入為出的奢侈生活。
- D. 員工涉及最少數量的未解決異常。

Answer: ([SHOW ANSWER](#))

an employee who avoids taking periodic vacations despite having accrued vacation time may be trying to conceal fraudulent or illegal activities that would be exposed in their absence. This is a common red flag for internal fraud and money laundering, as it indicates a lack of segregation of duties, internal controls, and oversight. Employees who engage in such behavior may also exhibit other signs of stress, defensiveness, or secrecy.

Learn about red flags for internal fraud, section "An employee may be a higher internal fraud risk when a combination of the following red flags are present", bullet point 1: "Unwilling to share duties or take leave." Money Laundering Red Flags | Key Behaviours and Indicators, section "Employee Red Flags", bullet point 1:

"Avoiding taking holidays or time off work."

Top 10 AML Red Flags: Warning Signs and Financial Risks, section "AML Red Flags Categories", sub-section "Employee Red Flags", bullet point 1: "Avoiding taking vacations or sick leaves."

NEW QUESTION: 295

在沒有自動化軟體來執行美國財政部外國資口管制辦公室 (OFAC) 制裁螢幕的情況下， 合規官員可以做什麼？

- A. 依賴 OFAC 的信用報告
- B. 在網路上進行關鍵字搜索
- C. 使用 OFAC 網站上的綜合制裁清單搜尋螢幕
- D. 取得 OFAC 特別指定國民名單的最新副本

Answer: (SHOW ANSWER)

As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. persons are generally prohibited from dealing with them. So it's covering all

NEW QUESTION: 296

哪個關鍵因素會導致金融機構 (FI) 決定退出客口關係？

- A. 評估所有風險因素後， 剩餘客口風險水準超出了金融機構的風險偏好。
- B. 客口是註冊慈善機構， 已知將資金匯往高風險地區， 而這些地區的盡職調口資訊有限
- C. 關閉客口帳口將有助於減少交易監控警報的數量。
- D. 客口交易會口生持續的交易監控警報， 但不會導致任何SAR/STR 備案。

Answer: A (LEAVE A REPLY)

The key factor that would result in the decision for a financial institution (FI) to exit a client relationship is when the level of residual client risk exceeds the FI's risk appetite. Residual client risk is the remaining risk after applying the FI's risk mitigation measures, such as customer due diligence, transaction monitoring, and suspicious activity reporting. Risk appetite is the level and type of risk that the FI is willing and able to accept in pursuit of its business objectives. If the residual client risk is higher than the risk appetite, the FI may decide to terminate the relationship to avoid potential regulatory, reputational, or operational consequences.

The other options are not necessarily key factors for exiting a client relationship, because:

The client is a registered charity known to remit funds to high risk geographies where there is limited due diligence information available. This option may indicate a higher level of inherent client risk, but it

does not necessarily mean that the FI should exit the relationship. The FI may be able to apply enhanced due diligence, ongoing monitoring, and risk-based controls to mitigate the risk and comply with the regulatory requirements.

The FI may also consider the nature and purpose of the client's activities, the source and destination of the funds, and the potential impact on the client's beneficiaries.

Closing the client accounts will help reduce the number of transaction monitoring alerts. This option may suggest a possible benefit of exiting the relationship, but it is not a key factor for making the decision. The FI should not base its decision solely on the volume of transaction monitoring alerts, but rather on the quality and relevance of the alerts, the results of the investigation, and the risk assessment of the client. The FI should also ensure that its transaction monitoring system is properly calibrated and validated to avoid generating excessive or false alerts.

Client transactions generate ongoing transaction monitoring alerts that did not result in any SAR/STR filings.

This option may indicate a need for reviewing and improving the transaction monitoring system or the investigation process, but it does not necessarily imply that the FI should exit the relationship. The FI should not assume that the absence of SAR/STR filings means that the client is low risk or that the alerts are irrelevant. The FI should conduct a thorough and timely investigation of the alerts and document the rationale for filing or not filing a SAR/STR. The FI should also consider the overall risk profile of the client and the nature and frequency of the transactions.

ACAMS Study Guide for the CAMS Certification Examination - 6th Edition, Chapter 3: AML Programs, Section 3.2: AML Program Components, Subsection 3.2.2: Risk Assessment, pp. 77-79 FFIEC BSA/AML Examination Manual, Section: Assessing Compliance with BSA Regulatory Requirements, Subsection: Suspicious Activity Reporting, pp. 4-5 Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations, Question 2, pp. 2-3

NEW QUESTION: 297

一位合規官員最近正在審閱國際慈善機構的交易數據，發現有較高風險的交易，終止銀行關係的原因是什麼？

- A. 該慈善機構的官方職位流動率很高
- B. 該慈善機構有幾筆國際資金轉賬
- C. 資金進出流向複雜且難以追蹤
- D. 慈善機構總部位於外國資管管制辦公室名單上的國家/地區

Answer: (SHOW ANSWER)

The Office of Foreign Assets Control (OFAC) is a US agency that administers and enforces economic and trade sanctions based on US foreign policy and national security goals¹. OFAC has a list of sanctions programs and country information for various regions and topics, such as Russia, Iran, North Korea, Cuba, and more². If a charity is headquartered in a country on the OFAC list, it means that the US government has imposed restrictions or prohibitions on transactions or dealings with that country, its government, entities, or individuals. This poses a high risk of violating the sanctions regulations and exposing the bank to legal, regulatory, or reputational consequences. Therefore, the bank may decide to terminate the banking relationship with the charity to avoid such risks.

The other options are not sufficient reasons to terminate the banking relationship, as they may not indicate illegal or suspicious activities by the charity. A high turnover rate of official positions may be due to various factors, such as organizational changes, staff turnover, or personal reasons. It does not necessarily imply that the charity is involved in money laundering or terrorist financing. However, the bank should verify the identity and authority of the new officials and update the customer due diligence information accordingly. The charity may have several incoming international funds transfers because it receives donations or grants from different sources or countries. This is not unusual for an international charity, as long as the funds are consistent with its stated purpose and activities. The bank should monitor the transactions and report any anomalies or red flags to the relevant authorities. The flow of funds both in and out may be complex and hard to trace because the charity operates in multiple jurisdictions or sectors, or has a decentralized or layered structure. This may increase the risk of money laundering or terrorist financing, but it does not necessarily mean that the charity is engaged in such activities. The bank should conduct enhanced due diligence and ongoing monitoring of the charity's transactions and beneficiaries, and apply a risk-based approach to mitigate the potential risks.

1: Sanctions List Search Tool | Office of Foreign Assets Control 2: Sanctions Programs and Country Information | U.S. Department of the Treasury

NEW QUESTION: 298

為了確保機構的反洗錢計畫是最新的，應採取哪些步驟？

- A. 董事會應至少每六個月評估並更新該計劃
- B. 聯邦執法人員應對該計劃進行審口，以了解控制方面的缺陷
- C. 該計劃應定期發送給該機構的政府監管機構
- D. 該計劃應至少每年重新評估一次

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) by ACAMS, an institution's anti-money laundering program should be reassessed at least annually to ensure that it is current, effective, and compliant with the applicable laws and regulations. The reassessment should include a review of the institution's risk assessment, policies and procedures, internal controls, training, and independent testing. The reassessment should also consider any changes in the institution's products, services, customers, geographic locations, or business environment that may affect its exposure to money laundering and terrorist financing risks¹.

The other options are not consistent with the best practices of maintaining an up-to-date anti-money laundering program. For example:

The program should be evaluated and updated at least every six months by the Board of Directors. While the Board of Directors has the ultimate responsibility for overseeing the institution's anti-money laundering program, it is not required to evaluate and update the program every six months. This may be too frequent and impractical, especially for large and complex institutions. The Board of Directors should, however, approve the program and any significant changes, and ensure that senior management implements and enforces the program effectively¹.

The program should be reviewed by a federal law enforcement officer for gaps in controls. While federal law enforcement agencies may conduct investigations or examinations of the institution's anti-

money laundering program, they are not responsible for reviewing the program for gaps in controls. This is the role of the institution's internal audit function or an external independent party, who should conduct periodic testing of the program's adequacy and effectiveness¹.

The program should be sent to the institution's government regulator on a periodic basis. While the institution's government regulator may request or review the institution's anti-money laundering program as part of its supervisory or enforcement activities, the institution is not obligated to send the program to the regulator on a periodic basis. The institution should, however, report any suspicious or unusual transactions or activities to the relevant authorities, such as the Financial Crimes Enforcement Network (FinCEN) or the Office of Foreign Assets Control (OFAC)¹.

Anti-Money Laundering Specialist (the 6th edition) by ACAMS

NEW QUESTION: 299

為什麼貨幣服務業務 (MSB) 經常被指控洗錢風險較高？

- A. MSB 應用於向受監管實體隱藏資金
- B. MSB 收取的佣金率通常低於銀行收取的佣金，這使得它們對犯罪分子具有吸引力
- C. MSB 可以將資金轉移到比銀行風險更高的國家
- D. MSB 受到監管審口，不同國家的監管審口差異很大

Answer: (SHOW ANSWER)

MSBs are frequently accused of being high risk for money laundering because they offer services that can facilitate the movement and conversion of illicit funds, such as currency exchange, money transmission, cheque cashing, and online payment. However, not all MSBs pose the same level of risk, and the degree of regulatory oversight and compliance requirements for MSBs may differ significantly depending on the jurisdiction they operate in. Some countries may have robust anti-money laundering (AML) regimes for MSBs, while others may have weak or inconsistent regulations, or even no regulations at all. This creates challenges and vulnerabilities for MSBs that operate across borders, as they may face different expectations and obligations from different authorities, or encounter gaps or loopholes in the AML framework. Moreover, some MSBs may operate informally or illegally, without registering or obtaining licenses from the relevant regulators, making them harder to detect and supervise. Therefore, MSBs are often perceived as high risk for money laundering, as they may be exploited by criminals who seek to take advantage of the regulatory discrepancies or deficiencies among countries.

Understanding risks and taking action for money service businesses¹

What Is A Money Services Business?²

Money Services Business (MSB) Information Center³

Money Services Business (MSB): Types, Examples, & AML Compliance⁴

NEW QUESTION: 300

埃格蒙特集團為世界各地的金融情報機構 (FII) 提供論壇的目標是什麼？

- A. 完善打擊洗錢和資助恐怖主義的國際法，並促進國口計劃的實施
- B. 為金融情報機構提供一個論壇，以改善在打擊洗錢和資助恐怖主義方面的合作，並促進該領域國口計劃的實施。

- C. 在打擊洗錢和資助恐怖主義方面改善與執法部門的溝通，並促進該領域國口計劃的實施。
- D. 改善與州和聯邦政府在打擊洗錢和資助恐怖主義方面的合作，並促進該領域國口計劃的實施。

Answer: (SHOW ANSWER)

According to the web search results, the Egmont Group is a united body of 170 Financial Intelligence Units (FIUs) that provides a platform for FIUs to securely exchange expertise and financial intelligence to combat money laundering, terrorist financing, and associated predicate offences¹². The goal of the Egmont Group is to provide a forum for FIUs around the world to improve support to their respective governments in the fight against money laundering, terrorist financing, and other financial crimes³⁴⁵. The other options are not correct because they either do not capture the full scope of the Egmont Group's activities, or they are not the primary focus of the Egmont Group.

<https://egmontgroup.org/>

<https://2009-2017.state.gov/j/inl/rls/nrcrpt/2015/vol2/239473.htm>

Reference: https://en.wikipedia.org/wiki/Egmont_Group_of_Financial_Intelligence_Units

NEW QUESTION: 301

哪種情況洗錢和恐怖分子融資活動的風險最高？

- A. 客口使用小面額鈔票購買賭場籌碼，但在將籌碼兌換為賭場支票之前不參與遊戲
- B. 客口購買賭場籌碼並參與重要的遊戲，然後請賭場檢口剩餘部分
- C. 客口使用信用卡購買賭場籌碼，並在將籌碼兌換為賭場支票之前進行最少的遊戲
- D. 客口使用附屬賭場帳口中的積分購買賭場籌碼，並在將籌碼兌換為

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) resources, the situation that is the highest risk for money laundering and terrorist financing activity is A. A customer purchases casino chips, using small denomination bank notes, but does not engage in game play before redeeming the chips for a casino check. This is because this situation may indicate some red flags of money laundering, such as:

Using small denomination bank notes, which may be an attempt to avoid detection or reporting by the casino or the authorities, as large amounts of cash are usually associated with criminal activity¹.

Not engaging in game play, which may indicate a lack of interest in gambling and a sole purpose of exchanging cash for a casino check, which is a more legitimate and less traceable form of payment².

Redeeming the chips for a casino check, which may be a way of laundering the cash through the casino, as the check can be deposited into a bank account or cashed at another location, without revealing the source of the funds³.

The other three options are less risky because:

B). A customer purchases casino chips and engages in significant game play before requesting a casino check for the remainder is less risky, as it may indicate a genuine interest in gambling and a legitimate source of funds. However, this situation may still require further investigation and verification, as some money launderers may use gambling as a cover for their illicit activities, or may use the casino check as a way of transferring funds to another jurisdiction or person⁴.

C). A customer purchases casino chips using a credit card and engages in minimal game play before redeeming the chips for a casino check is less risky, as it may indicate a low level of funds involved and

a traceable source of funds. However, this situation may still require further investigation and verification, as some money launderers may use credit cards to obtain cash advances from the casino, or may use the casino check as a way of repaying their credit card debt or transferring funds to another jurisdiction or person.

D). A customer purchases casino chips using credit from an account at an affiliated casino and engages in significant game play before redeeming the chips for a casino check is less risky, as it may indicate a regular and loyal customer of the casino and a legitimate source of funds. However, this situation may still require further investigation and verification, as some money launderers may use credit from an affiliated casino to avoid carrying cash or using credit cards, or may use the casino check as a way of transferring funds to another jurisdiction or person.

1: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 106 2: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 110 3: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 110 4: ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 110 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p.

110 : ACAMS, CAMS Study Guide, 6th Edition, Chapter 5, p. 110

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NEW QUESTION: 302

下列何者是建立反金融犯罪 (AFC) 合規計畫治理結構時需要考慮的重要因素？

- A. 確保結構由外部審計師或顧問審計
- B. 建立與機構規模和複雜度相稱的內部控制系統
- C. 指定一個合格的董事會來監督日常合規狀況
- D. 為 AFC 風險升級和問題建立明確的角色和職責

Answer: (SHOW ANSWER)

One of the core components of a strong AFC (Anti-Financial Crimes) compliance program is establishing clear roles, responsibilities, and lines of accountability, especially for escalating and addressing AFC risks and compliance issues. This governance clarity ensures effective implementation, transparency in decision-making, and timely resolution of compliance concerns. While external audits (option A) and internal controls (option B) are important, defining governance structure and escalation responsibilities (option D) is a foundational element. Additionally, the board of directors (option C) provides oversight-not day-to-day compliance monitoring.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Compliance Program Structures - Section:

Governance and Oversight Functions

NEW QUESTION: 303

線上金融科技容易受到洗錢風險的影響，因為

- A. 病毒嚴重損害通訊和商業。
- B. 身分被盜的風險大大增加。
- C. 進行交易的人的身分可能未知。
- D. 霸菱員工熟悉這項技術如何被濫用。

Answer: C (LEAVE A REPLY)

According to the Anti-Money Laundering Specialist (the 6th edition) resources, one of the challenges of online financial technologies is the difficulty of verifying the identity and legitimacy of the customers and counterparties. This creates opportunities for money launderers and other criminals to exploit the anonymity and speed of online transactions to move and conceal illicit funds. The other options are not directly related to the money laundering risk posed by online financial technologies.

ACAMS Study Guide for the Certified Anti-Money Laundering Specialist (the 6th edition), Chapter 5: Risk- Based Approach, page 133.

ACAMS Study Guide for the Certified Anti-Money Laundering Specialist (the 6th edition), Chapter 7: Money Laundering Risks and Methods, page 203.

NEW QUESTION: 304

兩個國家之間執行的、管理跨國資訊共享的法律文件稱為。

- A. 諒解備忘錄。
- B. 諒解聲明。
- C. 司法協助條約。
- D. 協議備忘錄。
- E. 請求緊急訊息。

Answer: (SHOW ANSWER)

NEW QUESTION: 305

下列何者最能描述監管機構、執法機構和金融情報機構 (FIU) 在洗錢調口 (包括跨國案件) 期間的合作程度？

- A. 監管機構主要獨立工作，但在國際執法機構要求時共享資訊。
- B. 金融情報機構主要處理金融機構的報告，而監管機構和執法機構僅限於執行國口反洗錢法，而缺乏國際合作。
- C. 執法機構和金融情報機構僅在國口調口期間合作，跨國調口則留給國際刑警組織等國際組織進行。
- D. 監管機構、執法機構和金融情報機構通常透過正式協議共享情報並協調努力，以簡化跨境洗錢調口。

Answer: (SHOW ANSWER)

* D: "Cooperation and coordination between regulatory authorities, law enforcement agencies, and FIUs are essential for effective AML investigations, especially in cross-border cases. This is often

accomplished through formal agreements, MOUs, and information-sharing mechanisms."(CAMS 6th Edition, International Cooperation in AML/CFT; FATF Recommendations 36-40) References: CAMS 6th Edition, International Cooperation FATF Recommendations 36-40

NEW QUESTION: 306

聯合國制裁是應對國際安全威脅最有效、合法的非暴力多邊工具，其作用如下：

- A. 可以比其他制裁制度更快實施。
- B. 被所有成員國迅速採用，並具有強而有力的執行機制。
- C. 可在國際範圍內適用，同時在國內執行。
- D. 比其他制裁制度表述得更為清晰。

Answer: (SHOW ANSWER)

United Nations (UN) sanctions are binding on all UN member states, but their effectiveness depends on swift adoption and enforcement by national governments.

Option B (Correct): For UN sanctions to be effective, they must be enforced by all member states through strong domestic legal mechanisms.

Option A (Incorrect): UN sanctions are not necessarily implemented faster than unilateral sanctions (e.g., U.S.

OFAC sanctions).

Option C (Incorrect): While UN sanctions apply internationally, enforcement depends on national governments, making implementation inconsistent.

Option D (Incorrect): Clarity of sanction measures is important, but enforcement is the primary factor determining effectiveness.

Key Features of UN Sanctions:

Mandated by the UN Security Council under Chapter VII of the UN Charter.

Binding on all 193 UN member states.

May include asset freezes, travel bans, and trade embargoes.

Best Practices for UN Sanctions Compliance:

Ensure national enforcement aligns with UN Security Council resolutions.

Monitor sanctioned individuals/entities through real-time screening tools.

Cooperate with international organizations to prevent sanctions evasion.

Reference:

FATF Recommendation 6 (Targeted Financial Sanctions)

United Nations Security Council (UNSC) Sanctions Guidelines

EU & OFAC Guidance on Sanctions Implementation

NEW QUESTION: 307

一家經營美術和古董的拍賣行以 1200 萬美元的價格將一幅著名畫作賣給了為一群當地投資者競標的代理人。十年前，這幅畫在拍賣會上以 500 萬美元的價格售出。

拍賣行透過投資者團體在離岸司法管轄區維護的帳戶透過電匯方式接收畫作付款。該帳戶沒有受益所有權資訊。

洗錢的兩個危險訊號是什麼？（選兩個）

- A. 透過電匯收到款項。
- B. 代理人為一群投資者競標這幅畫。
- C. 這幅畫的價口在十年口增加了一倍以上。
- D. 從離岸司法管轄區的帳戶收到付款。
- E. 缺少原始帳戶的實益所有權詳細資料。

Answer: (SHOW ANSWER)

The payment received from an account in an offshore jurisdiction and the lack of beneficial ownership details for the originating account are two money laundering red flags. Offshore jurisdictions are often used by money launderers to hide the source and destination of their funds, as they typically have low transparency and weak regulatory oversight. The absence of beneficial ownership information makes it difficult to identify the true owners and controllers of the funds, and to assess the legitimacy and risk of the transaction. These factors increase the possibility that the payment is related to money laundering, tax evasion, or other illicit activities.

ACAMS CAMS Certification Study Guide, 6th Edition, page 33

ACAMS CAMS Certification Exam Outline, 6th Edition, Domain 1, Task 1.2

ACAMS CAMS Certification Video Training Course, Module 1, Lesson 1.2

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 315

NEW QUESTION: 308

居住在美國的移民開設包含金融卡的銀行帳戶。幾個月後，交易監控系統識別出帳戶中的小額存款，然後從與衝突地區接壤的國家進行相應的 ATM 提款。

銀行該如何因應？

- A. 阻止任何進一步的活動
- B. 提交可疑交易報告
- C. 啟動對活動的調查
- D. 如果交易活動持續，請聯絡客戶

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Certification Study Guide (6th edition), the bank should file a SAR if it knows, suspects, or has reason to suspect that a transaction involves funds derived from illegal activity, or is intended or conducted to hide or disguise funds or assets derived from illegal activity, or to evade any BSA regulation or federal law, or has no business or apparent lawful purpose, or is not the sort in which the customer would normally be expected to engage¹. The scenario described in the question meets these criteria, as the small deposits and withdrawals from a high-risk country could indicate money laundering, terrorist financing, or other illicit activities. The bank should also document its decision to file or not file a SAR, and retain the supporting documentation for five years¹.

The other options are not correct because they either do not comply with the BSA requirements, or do not adequately address the potential risk of the activity. Blocking any further activity could alert the

customer of the bank's suspicion, and could also interfere with law enforcement investigations. Initiating an investigation into the activity could be part of the bank's due diligence process, but it does not substitute the obligation to file a SAR if the activity is suspicious. Contacting the customer could also tip off the customer, or elicit false or misleading explanations that could hinder the bank's assessment of the activity.

ACAMS CAMS Certification Study Guide (6th edition), page 82-83. 12345678 [9]

NEW QUESTION: 309

在發現員工無意中向正在組織交易的客口提供協助時，反洗錢專家應建議

- A. 開始這些員工的終止程序。
- B. 聯絡執法部門以監控這些員工。
- C. 為這些員工提供補救訓練。
- D. 將這些員工轉移到另一個分公司。

Answer: (SHOW ANSWER)

Structuring is the practice of breaking down large amounts of cash into smaller transactions to avoid triggering currency transaction reports (CTRs) or suspicious activity reports (SARs) by financial institutions.

CTRs are required for cash deposits or withdrawals of more than \$10,000 in the United States, and SARs are filed when there is a reasonable suspicion of money laundering or other illicit activity. By making multiple deposits of less than \$10,000 at different tellers, the owner of the retail store is attempting to evade the reporting requirements and conceal the source or destination of the funds. This is a common technique used by money launderers in the placement stage of the money laundering process, when they try to introduce illegal proceeds into the financial system. Structuring is illegal under the Bank Secrecy Act and can result in civil and criminal penalties.

6: CAMS Certification Package - 6th Edition | ACAMS, Chapter 2: Money Laundering Risks and Methods, page 43

1: Structuring Cash Deposits, Withdrawals, & Transactions Risk, Golding & Golding

2: Structuring - Wikipedia

NEW QUESTION: 310

一名在銀行工作的反洗錢專家剛收到執法機構的法律要求，要求公佈與該銀行帳戶相關的所有金融交易記錄。專家立即認出該帳戶是該銀行執行長兄弟所擁有的帳戶。

在收集所需文件的研究過程中，專家發現了他發送給銀行行長的幾份內部備忘錄，其中擔心與該帳戶相關的可能存在可疑活動。這位專家回憶說，銀行行長對每份備忘錄都進行了口頭回應，解釋了這項活動，並表示沒有理由擔心。專家該對這些內部備忘錄做什麼？

- A. 將這些備忘錄放入他的個人檔案中，以備日後需要時使用
- B. 請銀行行長將他對專家的指示記錄下來
- C. 致電執法人員並建議他修改法律請求以包含這些備忘錄
- D. 將情況告知銀行資深法律顧問

Answer: (SHOW ANSWER)

the specialist should inform the bank's senior legal advisor of the situation and seek guidance on how to handle the legal request and the internal memos. The specialist should not take any action that could compromise the integrity of the legal request, the bank's anti-money laundering program, or the specialist's own professional obligations. The specialist should not place the memos in his personal files, as this could be seen as hiding or tampering with evidence. The specialist should not ask the bank president to document his instructions, as this could create a conflict of interest or a perception of undue influence. The specialist should not call the law enforcement agent and suggest he modify the legal request, as this could be seen as interfering with the investigation or tipping off the account holder.

Legal Sector Affinity Group (LSAG) Anti-Money Laundering Guidance for the Legal Sector (January 2021) p. 1321 ACAMS: Certified Anti-Money Laundering Specialist | ACAMS2 Anti-Money Laundering - The Law Society of Singapore³

NEW QUESTION: 311

離岸公司由居住在不同司法管轄區的四個平等合夥人擁有。一名合夥人出示了一份經過驗證的授權書，顯然是由其餘三名合夥人以他的名義簽署的，並要求代表所有合夥人開設一個銀行帳戶。他需要盡快完成這項工作，因為還有一大筆押金待處理。開口官員聯絡銀行的反洗錢官員尋求建議。作為第一步，反洗錢官員應建議採取下列哪一項措施？

- A. 驗證所有合作夥伴的身份。
- B. 驗證存款來源。
- C. 向適當的金融情報部門提交可疑交易報告。
- D. 向埃格蒙特集團提交可疑交易報告。

Answer: A (LEAVE A REPLY)

The anti-money laundering officer should advise the account-opening officer to verify the identity of all the partners as an initial step. This is because opening a bank account for an offshore company with multiple owners from different jurisdictions poses a high risk of money laundering and terrorist financing. Therefore, the bank should apply enhanced due diligence measures to ensure that the offshore company and its owners are legitimate and not involved in any criminal activities. One of the key measures is to verify the identity of all the partners, not just the one who presents the power of attorney. This will help the bank to establish the beneficial ownership and control structure of the offshore company, as well as to detect any possible fraud, forgery, or coercion in the power of attorney document. The bank should also verify the authenticity and validity of the power of attorney, and the scope and purpose of the authority granted to the partner who requests the account opening.

The other options are less important or irrelevant as initial steps. Verifying the source of the deposit is also a part of the enhanced due diligence process, but it should be done after verifying the identity of the partners and the offshore company. Filing a suspicious transaction report with the appropriate Financial Intelligence Unit or the Egmont Group is a possible action that the bank may take if it detects any indicators of money laundering or terrorist financing in the account opening process, but it is not an initial step. The Egmont Group is an international network of Financial Intelligence Units that facilitates information exchange and cooperation, but it is not a reporting authority.

ACAMS Study Guide, Chapter 3: Customer Identification and Verification, 1 ACAMS Study Guide, Chapter 4: Customer Risk Assessment, 2 ACAMS Study Guide, Chapter 5: Ongoing Monitoring, 3 Powers of attorney: opening a bank account, 4

NEW QUESTION: 312

銀行出納員收到警官的書面請求，要求其審閱其客戶的帳戶，該請求填寫在預先填寫的表格上，並帶有警官的正式信頭。該官員懷疑前一位顧客正在從事小規模行為。銀行出納員該採取什麼行動？

- A. 在管理階層批准後向警察提供客戶的帳戶資訊。
- B. 將警官對客戶帳號資訊的請求回報給合規官。
- C. 拒絕警官索取客戶帳號資料的請求，並上報給合規官。
- D. 向警官提供客戶的帳戶資訊。

Answer: (SHOW ANSWER)

The compliance officer should evaluate the request, determine whether it is valid, and provide the necessary information, subject to management approval. It is important to follow the bank's policies and procedures for responding to law enforcement requests, including verifying the authenticity of the request and the identity of the officer making the request. Additionally, it is important to protect customer privacy and ensure that sensitive information is not released to unauthorized individuals. (Reference: Certified Anti-Money Laundering Specialist (the 6th edition), Chapter 6)

NEW QUESTION: 313

當地一家小銀行的合規官員在報紙上讀到，一名長期帳戶持有者的當地高級公職人員因收受一家在當地設有辦事處的知名建築公司的賄賂而受到主管部門調查。合規官員立即檢查該官員的帳戶以及最近在銀行開設的其他帳戶。該官員幾週前在銀行開設了一個新帳戶。合規官員對這些帳戶的調查顯示，該官員的長期帳戶沒有異常活動，最近開設的帳戶自開設以來沒有任何活動。合規官下一步該做什麼？

- A. 等待新帳戶收到資金並確認資金來源。
- B. 致電主管機關評估是否需要提交可疑交易報告。
- C. 與開設該帳戶的工作人員會面，以了解其性質和目的。
- D. 致電官員辦公室確認是否需要多個帳戶。

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Study Guide (the 6th edition), one of the key steps in conducting an effective investigation of a potential money laundering or terrorist financing activity is to gather all relevant information about the customer and the transaction, including the nature and purpose of the account, the source and destination of funds, the expected account activity, and the customer's risk profile¹. In this case, the compliance officer should meet with the staff who opened the new account for the public official to obtain this information and assess whether the account is consistent with the customer's profile and needs, or whether it indicates a possible attempt to conceal or launder illicit funds. Waiting for the new account to receive funds, calling the competent authorities, or calling the official's office are not appropriate actions at this stage, as they may compromise the investigation, alert the customer, or violate confidentiality rules¹.

NEW QUESTION: 314

外國資口管制辦公室 (OFAC) 制裁的相關交易何時可以被允許？

- A. 當銀行董事會批准 OFAC 對制裁相關交易的風險偏好時
- B. 透過 OFAC 許可流程確定交易不會損害美國的政策目標
- C. 僅當聯邦銀行監管機構在處理交易之前提供 OFAC 批准時
- D. 經過嚴格的 OFAC 口部審核流程來審口與制裁相關的風險後

Answer: (SHOW ANSWER)

The Office of Foreign Assets Control (OFAC) administers and enforces economic sanctions programs [1][2], which are designed to protect US national security, foreign policy, and economic interests. Transactions that would otherwise be prohibited can be allowed through an OFAC licensing process, in which the OFAC evaluates the request to determine that the transaction does not undermine US policy objectives.

NEW QUESTION: 315

私人投資公司可能容易受到洗錢的影響，因為：

- A. 要確定最終受益所有人可能很困難。
- B. 他們交易不在證券交易所交易的股票。
- C. 它們存在於具有嚴格保密法的離岸司法管轄區，以保護其所有者的隱私。
- D. 它們是為維護客口機密而成立的空殼公司。

Answer: A (LEAVE A REPLY)

Private investment companies (PICs) are potentially vulnerable to money laundering due to the difficulty in identifying the ultimate beneficial owners. PICs are often used to hold and manage private wealth, making them attractive targets for money launderers. Since these entities are privately held and not publicly traded, it can be challenging to identify the individuals who ultimately control or benefit from them. This makes it easier for money launderers to use them to disguise the origins of illicit funds.

NEW QUESTION: 316

當調口人員對潛在的可疑活動開始財務調口時，應該採取的第一步是什麼？

- A. 聯絡該國金融情報部門 (FIU) 官員，尋求有關潛在可疑活動是否確實可疑的建議
- B. 確定潛在的可疑活動是否與客口的交易行為、業務性質和職業相符。
- C. 收集和評估口部資訊來源，包括從客口交易以及價口和數量獲得的資訊。
- D. 識別和審口外部訊息，包括線上狀態、客口相關實體和相關媒體。

Answer: C (LEAVE A REPLY)

The first step in a financial investigation is to review and analyze all internal sources of information related to the suspicious transaction.

- * Option C (Correct): Gathering and assessing internal data helps investigators establish a baseline for normal vs. suspicious customer behavior. This includes reviewing KYC (Know Your Customer) documentation, transaction history, and any previous alerts on the customer.
- * Option B (Incorrect): This is part of the investigation, but an investigator first needs to gather data before determining consistency with expected behavior.
- * Option A (Incorrect): An FIU is typically contacted after internal analysis has been completed and a Suspicious Activity Report (SAR) is warranted.
- * Option D (Incorrect): External information is useful, but internal data should be reviewed first to confirm whether a case needs escalation.

Reference: FATF Recommendation 10 (Customer Due Diligence); Wolfsberg Group Principles on AML Investigations.

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NEW QUESTION: 317

一家銀行人力資源部的招募經理已將一名候選人列入該銀行私人銀行部客戶關係經理職位的候選名單。該銀行的合規政策要求進行適當的背景調查，以防止詐欺和洗錢風險。哪些資源對於識別入圍候選人的潛在負面資訊最有用？（選擇三項）

- A. 過去的就業記錄。
- B. 來自親密同事的個人推薦。
- C. 個人簡歷。
- D. 網路與公開媒體搜尋。
- E. 犯罪歷史搜尋。

Answer: (SHOW ANSWER)

Financial institutions must conduct thorough background checks on employees in sensitive roles (e.g., private banking) to mitigate fraud, insider trading, and money laundering risks.

Option A (Correct): Past employment records help verify work history and identify any red flags related to prior financial misconduct.

Option D (Correct): Internet and media searches reveal any negative press, regulatory issues, or connections to illicit activity.

Option E (Correct): Criminal history searches help screen for prior convictions related to financial crimes.

Why Other Options Are Incorrect:

Option B (Incorrect): Personal references are less reliable and may not uncover objective risk factors.

Option C (Incorrect): A resume is self-reported and should be verified using independent sources.

Best Practices for Employee Background Screening:

Conduct enhanced due diligence for high-risk roles (e.g., private bankers, compliance officers).

Use reliable background screening tools and legal databases.

Verify employment history and check against regulatory blacklists.

Reference:

FATF Recommendation 18 (Internal Controls & Employee Screening)

Wolfsberg Group Guidance on AML Employee Background Checks

6th EU AML Directive (6AMLD) on Employee Due Diligence

NEW QUESTION: 318

埃格蒙特集團如何協助金融情報部門成員實現他們的目標？（選三）

- A. 為擴大與相互資訊交換相關的合作並使之系統化提供支持
- B. 透過科技應用促進更好、更安全的通信
- C. 相關當局在全球協調的基礎上製定涉嫌恐怖分子的官方名單
- D. 鼓勵金融情報機構的營運自主權
- E. 維護統一的全球資金轉移格式，有助於偵口洗錢活動
- F. 提供有關恐怖分子和恐怖主義金融支持者所使用的常見洗錢策略的信息

Answer: (SHOW ANSWER)

The Egmont Group assists financial intelligence unit members to accomplish their goals by providing support to expand and systematize cooperation related to the reciprocal exchange of information, fostering better and secure communication through the application of technology, and encouraging operational autonomy of financial intelligence units. Additionally, the Egmont Group also maintains uniform global formats for funds transfers that assist in the detection of money laundering and supplies information on the common money laundering tactics used by terrorists and financial supporters of terrorism.

NEW QUESTION: 319

政府金融情報機構透過哪兩種方式與公私部門互動？

（選兩個）

- A. 管轄主管機關所使用的調口方法
- B. 調解金融機構與調口機關之間的糾紛
- C. 接收並分析金融和非銀行機構提交的披露信息
- D. 向主管機關傳播訊息及其分析結果

Answer: (SHOW ANSWER)

A government Financial Intelligence Unit (FIU) is a national body or agency that collects, analyzes, and disseminates information on suspicious or unusual financial activity related to money laundering, terrorist financing, or other financial crimes¹². One of the main functions of an FIU is to receive and analyze disclosures or reports filed by financial and non-bank institutions, such as banks, casinos, money service businesses, lawyers, accountants, etc., that are obliged to report transactions or

activities that may indicate money laundering or terrorist financing³⁴. Another key function of an FIU is to disseminate the information and the results of its analysis to competent authorities, such as law enforcement, prosecutors, regulators, or other FIUs, for further investigation, prosecution, or preventive action⁵⁶. These two ways of interaction enable the FIU to act as a bridge between the public and private sectors in the fight against financial crimes.

1: What are Financial Intelligence Units (FIUs)?, Dow Jones, 3; 2: Financial Intelligence Unit, Wikipedia, 2; 3: The Role of Financial Intelligence Units in Fighting Money Laundering and Terrorist Financing, IMF, 8; 4: What is an FIU?, Egmont Group of Financial Intelligence Units, [9]; 5: FIU Functions, FATF, [10]; 6: FIU.NET, Europol, [11].

Reference: <http://pubdocs.worldbank.org/en/834721427730119379/AML-Module-2.pdf>

NEW QUESTION: 320

下列哪一種方法是執行水平掃描的有效方法？(選兩個)

- A. 訂口監理機關的新聞通訊
- B. 依賴同儕和工作小組的資訊和見解
- C. 使用特定提供者進行監管範圍掃描
- D. 定期聯絡監管機構，詢問最新情況和未來發展

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 321

關於 FATF 在金融集團口共享 SAR/STR 資訊的標準，哪一個口法是正確的？

- A. 金融機構必須保留 SAR/STR 和支持文件的副本，自提交STR 之日起五年
- B. 金融機構根本無法分享客口訊息，因為它是機密的
- C. 金融機構 (FI) 應針對反洗錢目的共享資訊的保密性建立充分的保障措施。
- D. 金融機構必須獲得監管機構的批准才能分享 SAR/STR 資訊和支援文件。

Answer: ([SHOW ANSWER](#))

According to the FATF Guidance on Private Sector Information Sharing, FIs should establish sufficient safeguards concerning the confidentiality of information shared for AML purposes, both within the same financial group and between FIs not belonging to the same group. These safeguards include ensuring that the information is shared only with authorized personnel who have a need to know, that the information is used only for the intended AML purpose, and that the information is protected from unauthorized access, disclosure, or misuse. FIs should also comply with the applicable legal and regulatory requirements on data protection and privacy, and respect the rights and interests of the customers whose information is shared¹.

1: FATF Guidance on Private Sector Information Sharing¹

NEW QUESTION: 322

某國的金融情報機構 (FIU) 收到一份涉及重大可疑資金轉移的特別報告員報告，這些資金轉移不僅發生在其管轄範圍口，還發生在外國，需要外國提供更多資訊來確定是否需要將此事提交當地起訴。

在這種情況下，下列哪一項敘述是正確的？

- A. 國家主權表示資訊不能被外國取得。

- B. 取得來自外國的資訊違反了國際資料保護法。
- C. 任何與洗錢有關的資訊都可能隨時從任何組織收到，無論其管轄範圍如何。
- D. 艾格蒙特集團成員國可以互相要求資訊援助。

Answer: (SHOW ANSWER)

International cooperation is essential in AML investigations, and the Egmont Group facilitates FIU-to-FIU information sharing.

Option D (Correct): Egmont Group members can request and share information for AML/CFT investigations.

Option A (Incorrect): Sovereignty does not prevent cooperation under proper agreements.

Option B (Incorrect): AML laws allow data sharing under legal frameworks like Mutual Legal Assistance Treaties (MLATs).

Option C (Incorrect): Information sharing is restricted to FIUs and authorized agencies, not all organizations.

Reference: FATF Recommendation 40 (International Cooperation), Egmont Group FIU Guidelines, Mutual Legal Assistance Treaties (MLATs).

NEW QUESTION: 323

下列哪一項是人壽保險公司相關的洗錢危險訊號？（選兩項）

- A. 提前幾年支付保費並提前終止以獲得退款
- B. 擁有多份保單的自然人
- C. 提供高額賠償的高保費人壽保險
- D. 定期切換政策並接受處罰
- E. 向老年人支付的受益人款項

Answer: (SHOW ANSWER)

* Paying premium several years in advance and terminating early for a refund (A): "A typical red flag is when a policyholder pays large premiums up front and then seeks early termination to receive a refund. This can be used to launder illicit funds by integrating them into the financial system and then retrieving 'clean' money." (CAMS 6th Edition, Life Insurance ML/TF Risks; FATF Guidance for a Risk-Based Approach for the Life Insurance Sector)

* Regularly switching policies and accepting penalties (D): "Frequent changes in insurance policies or products, even at a financial loss, are considered suspicious. This may indicate an attempt to obscure the money trail or integrate illicit proceeds." (CAMS 6th Edition, ML/TF Red Flags in Life Insurance)

Incorrect Options:

- * B: Having multiple policies is common and not itself a red flag.
- * C: High premiums/payouts are not inherently suspicious.
- * E: Beneficiary payouts to elderly people are not ML/TF red flags.

References:

CAMS 6th Edition, Life Insurance Red Flags

FATF Guidance for a Risk-Based Approach for the Life Insurance Sector

NEW QUESTION: 324

一名員工聽到一位同事在電話中與一位客戶就如何確保未來交易不會提交可疑交易報告提供建議。員工應該採取什麼行動？

- A. 向當地警方報告談話內容
- B. 向合規官報告對話
- C. 告訴同事提供此類建議是違反政策的
- D. 忽略這種情況，因為該同事是該客戶的關係經理

Answer: (SHOW ANSWER)

According to the Anti-Money Laundering Specialist (the 6th edition) resources, the employee should report the conversation to the compliance officer because the colleague is engaging in tipping off, which is a serious violation of anti-money laundering laws and regulations. Tipping off is the act of informing a person or entity that they are the subject of a suspicious transaction report or an investigation, or providing any information that may compromise or impede the investigation. Tipping off can result in criminal penalties, civil liabilities, and disciplinary actions for the individual and the institution. Therefore, the employee has a duty to report the colleague's misconduct to the compliance officer, who is responsible for ensuring compliance with the anti-money laundering policies and procedures, and taking appropriate corrective actions.

CAMS Certification Package - 6th Edition | ACAMS, Chapter 3: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), page 97 CAMS Certifications: How to Get CAMS Certified | ACAMS, CAMS Examination Preparation, page 8 ACAMS CAMS Certification Video Training Course - Exam-Labs, Module 3: Compliance Standards for Anti-Money Laundering and Combating the Financing of Terrorism, video 3.4: Tipping Off and Confidentiality Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 8, Answer B

NEW QUESTION: 325

外國資⼁管制辦公室 (OFAC) 對與美國相關的法人實體和個人有何規定？（選兩個）

- A. 在外國正式註冊的美國法人實體的子公司不受 OFAC 規則的約束。
- B. 美國國民必須遵守 OFAC 規則，無論他們身在世界何處
- C. 前往美國短期度假的外國人有義務遵守 OFAC 規則。
- D. 任何外國公司如果根據 OFAC 規則與受制裁國家進行交易，也會受到處罰
- E. 在美國設有分支機構的外國法人實體的總部無需遵守 OFAC 規則。

Answer: (SHOW ANSWER)

The rules imposed by the Office of Foreign Assets Control (OFAC) for legal entities and persons related to the US are:

Nationals of the US must comply with OFAC rules, regardless of where they are located in the world. This means that US citizens, permanent residents, and entities organized under US law are subject to OFAC sanctions and prohibitions, even if they operate or reside outside the US¹².

Any foreign corporation is also penalized if it conducts transactions with sanctioned countries under OFAC rules. This means that non-US entities that engage in trade or financial dealings with OFAC-designated countries, entities, or individuals are liable to face civil or criminal penalties, as well as secondary sanctions that could restrict their access to the US market or financial system³⁴.

The other options are not correct, because:

A subsidiary of a legal entity of the US, which is formally registered in a foreign country, is not exempt from OFAC rules. This means that foreign-incorporated entities that are owned or controlled by US persons or entities are also subject to OFAC sanctions and prohibitions, unless they are specifically authorized or licensed by OFAC12.

A foreign individual visiting the US for a short vacation is not obligated to follow OFAC rules. This means that non-US persons who are temporarily present in the US are not subject to OFAC sanctions and prohibitions, unless they are involved in transactions that have a US nexus or violate other US laws.

The head office of a foreign legal entity which has a branch in the US does not need to comply with OFAC rules. This means that non-US entities that have a presence or operation in the US are not subject to OFAC sanctions and prohibitions, unless they are involved in transactions that have a US nexus or violate other US laws.

References:

ACAMS CAMS Certification Video Training Course - Exam-Labs3

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)4 ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 7, page 147: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-7.pdf>

ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 7, page 148: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-7.pdf>

ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 7, page 149: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-7.pdf>

NEW QUESTION: 326

一家銀行的合規官正在審閱一家國營公司新商業帳戶的入職文件。該官員無法核實該公司實際所有人的身分。

僅有的

提供了有關指定所有者的信息，但列出的地址均不是本地地址。據稱，該業務的目的和未來預期活動包括現金信件、匯票和國際匯款。

哪些危險訊號表示洗錢風險增加？

- A. 建議預期活動包括現金信函和匯票
- B. 業務性質與目的包括國際匯款
- C. 開戶時提供的姓名被認定為公司的代表提名人
- D. 帳戶簽署人的政府簽發的身份證件列出了開設分行帳戶地點以外的地址

Answer: (SHOW ANSWER)

According to the ACAMS Study Guide 6th Edition, Chapter 2, page 37, one of the red flags of money laundering or terrorist financing is the use of nominees, trusts, or third parties to hide the identity, ownership, or control of the funds or assets involved in the transaction. Nominees are individuals or entities that act on behalf of the actual or beneficial owners of a company, trust, or account, and may be used to conceal the source, destination, or purpose of the funds or assets. Nominees may also be used to evade taxes, sanctions, or regulatory requirements.

In this case, the compliance officer is unable to verify the identity of the beneficial owners of the company, and only information on the nominee owners was provided. This raises the suspicion that the company may be involved in money laundering or terrorist financing activities, and that the nominee owners may be acting as fronts or intermediaries for the actual or beneficial owners. The compliance officer should conduct further due diligence on the company, the nominee owners, and the beneficial owners, and report any suspicious or unusual activity to the relevant authorities.

ACAMS Study Guide 6th Edition, Chapter 2, page 37

Beneficial Ownership Meaning and Regulation - Investopedia

What is a nominee shareholder? | LawBite

NEW QUESTION: 327

一名反洗錢分析師正在審閱一份新客戶名單，以確認潛在的高風險客戶已被識別並接受加強的盡職調查。哪些新客戶需要加強盡職調查？

- A. 非營利醫院
- B. 募款組織
- C. 員工福利計畫信託
- D. 醫療實踐有限合夥企業

Answer: (SHOW ANSWER)

A fundraising organization is a type of non-profit organization that may be vulnerable to money laundering and terrorist financing risks, as they often operate in high-risk areas, deal with large amounts of cash, and have complex and opaque structures. Therefore, a fundraising organization warrants enhanced due diligence, which is a higher level of customer verification and monitoring that goes beyond the standard customer due diligence measures. Enhanced due diligence may include obtaining additional information on the source of funds, the purpose of the relationship, the beneficiaries, and the governance of the organization.

ACAMS Study Guide for the CAMS Certification Examination, 6th Edition, Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Section 2.2:

Customer Due Diligence, p. 33-34

Anti-money laundering - a guide to customer due diligence

Customer due diligence | The Law Society

NEW QUESTION: 328

合規官員正在為位於金融行動特別工作組成員國的金融機構制定反洗錢計畫。該機構與非金融行動工作小組成員的國家/司法管轄區的客戶開展業務。該計畫應解決下列哪些問題？

1. 要求識別帳戶的受益所有人。
2. 開立新帳戶時的客戶身分要求。
3. 金融機構報告可疑交易的義務。
4. 凍結可疑交易資金的義務。

A. 僅限 1、2 和 3

B. 限 1、2 和 4

C. 僅限 1、3 和 4

D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

A financial institution located in a Financial Action Task Force (FATF) member country should address the following issues in its anti-money laundering program when dealing with customers located in countries

/jurisdictions that are not members of FATF:

The requirement to identify the beneficial owners of accounts: Beneficial owners are the natural persons who ultimately own or control a customer or a legal entity. Identifying the beneficial owners of accounts is a key component of customer due diligence (CDD) and helps the financial institution to assess the risk profile of the customer, prevent the misuse of legal entities for money laundering or terrorist financing, and comply with the FATF Recommendations¹².

The requirement for customer identification for the opening of new accounts: Customer identification is the process of verifying the identity of a customer using reliable and independent sources of information or documents. Customer identification is another essential element of CDD and helps the financial institution to establish a business relationship with the customer, prevent identity fraud, and comply with the FATF Recommendations¹³.

The financial institution's obligation to report suspicious transactions: Suspicious transactions are transactions that have no apparent economic or lawful purpose, or are inconsistent with the customer's known profile or business activities, or indicate involvement in money laundering or terrorist financing. Reporting suspicious transactions to the competent authorities is a core obligation of the financial institution under the FATF Recommendations¹⁴ and helps to detect and deter illicit activities and support law enforcement investigations.

The obligation to freeze funds involved in suspicious transactions is not an issue that should be addressed in the anti-money laundering program, as it is not a requirement under the FATF Recommendations. The FATF Recommendations require the financial institution to freeze funds or other assets of designated persons and entities that are subject to targeted financial sanctions related to terrorism, proliferation of weapons of mass destruction, or other threats to the international financial system¹. However, the financial institution is not obliged to freeze funds involved in suspicious transactions, unless it receives a specific order from the competent authorities or the courts.

The FATF Recommendations, as amended November 2023

Interpretive Note to Recommendation 10 (Customer Due Diligence), paragraphs 5(b) and 6
Recommendation 10 (Customer Due Diligence), paragraph 1
Recommendation 20 (Reporting of Suspicious Transactions)
Recommendation 6 (Targeted Financial Sanctions Related to Terrorism and Terrorist Financing),
Recommendation 7 (Targeted Financial Sanctions Related to Proliferation), and
Recommendation 8 (Non- Profit Organisations)

NEW QUESTION: 329

準備可疑活動報告 (SAR) 時應向董事會或指定的專門委員會提供哪些內容？

A. 報告期間提交的 SAR 的所有可能詳細信息

- B. 報告期間提交的 SAR 約束下的所有客戶的名稱
- C. 報告期間提交的 SAR 統計數據
- D. 報告期間提交的所有 SAR 的副本

Answer: (SHOW ANSWER)

The board of directors or designated specialized committee should be provided with statistical data regarding SARs filed during the reported period, such as the number, type, and amount of SARs, as well as any trends or patterns identified. This would enable them to oversee the effectiveness of the anti-money laundering program and ensure compliance with regulatory requirements. Providing too much detail, such as names of customers or copies of SARs, could compromise the confidentiality of the SARs and expose the institution to legal risks.

References:

ACAMS Study Guide for the CAMS Certification Examination, 6th Edition, Chapter 5, page 153, section "Reporting to the Board of Directors or Designated Specialized Committee".

ACAMS CAMS Certification Video Training Course, Module 5, Lesson 5.4, "Reporting to the Board of Directors or Designated Specialized Committee".

NEW QUESTION: 330

哪些陳述涉及金融行動特別工作組 (FATF) 和 FATE 類型的區域機構 (FSRB) 的任務、角色和責任？ (選擇兩個)。

- A. 正在制定標準。作為磋商過程的一部分，FATF 只會考慮其成員國的意見。
- B. FSRB 有權制定其成員國必須遵守的標準。
- C. 金融服務監理委員會在確定和解決各個成員國的反洗錢技術援助需求方面發揮著重要作用。
- D. FATF 和 FSRB 是獨立的組織，擁有打擊洗錢、恐怖主義融資和擴散的共同目標。
- E. FATF 成員國不能同時成為 FSRB 成員。

Answer: (SHOW ANSWER)

C: FSRBs play an essential role in identifying and addressing AML technical assistance needs for their individual member countries. The FSRBs are responsible for promoting the effective implementation of the FATF Recommendations at the regional level, including by assisting member countries in identifying technical assistance needs and facilitating the provision of such assistance.

D: FATF and FSRBs are free-standing organizations that share the common goals of combating money laundering and the financing of terrorism and proliferation. The FATF is an intergovernmental body that sets global standards for AML/CFT and promotes their effective implementation, while the FSRBs are regional organizations that work to promote the effective implementation of the FATF Recommendations at the regional level.

NEW QUESTION: 331

一名新客戶聯繫了位於高風險管轄區的一家大批量貴金屬和寶石交易商，有意出售價值 20 萬美元的黃金。該客戶是由經銷商的一位長期家庭朋友推薦的，沒有提供任何有關銷售的背景或商業目的的資訊。經銷商同意僅根據參考進行購買。

什麼是洗錢危險訊號？

- A. 客戶是經銷商的老朋友推薦的

- B. 貴金屬交易商在高風險司法管轄區運營
- C. 一位新客戶正在向一位大批量交易商出售價值 20 萬美元的黃金
- D. 客戶未提供交易的背景資訊或商業目的

Answer: (SHOW ANSWER)

This is when a customer or a transaction does not provide sufficient or credible information about their identity, source of funds, business activity, or purpose of the transaction. Lack of transparency can indicate that the customer or the transaction is trying to conceal the origin, ownership, or destination of illicit funds, or to evade regulatory scrutiny or reporting obligations. Lack of transparency is a common risk factor for money laundering and terrorist financing, especially in high-risk jurisdictions or sectors. The other options are not necessarily red flags, although they may increase the risk or require further due diligence depending on the circumstances and the risk profile of the customers and countries involved. Option A describes a referral by a longtime friend of the dealer, which may be a legitimate source of trust or business relationship, but it does not substitute the need for proper customer identification and verification. Option B describes the location of the precious metals dealer, which may be a high-risk jurisdiction due to factors such as weak governance, corruption, crime, or sanctions, but it does not imply that the dealer or the customer is involved in money laundering. Option C describes the amount and nature of the transaction, which may be unusual or large, but it does not necessarily indicate money laundering, as long as the customer can provide a reasonable explanation and evidence for the source and use of funds.

ACAMS CAMS Certification Video Training Course - 6th Edition¹

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)² ACAMS CAMS Study Guide - 6th Edition, Chapter 3, pages 64-65

<https://www.acams.org/wp-content/uploads/2019/09/ACAMS-CAMS-Study-Guide-6th-Edition-Chapter-3.pdf>

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NEW QUESTION: 332

銀行公司銀行部門的客戶經理需要接受針對該部門最可能遇到的風險的專門反洗錢培訓。哪些類型的內容最適合本次培訓？（選兩個）

- A. 適用於貨幣工具報告的洗錢類型
- B. 適用的反洗錢法規
- C. 監管考試最佳實踐
- D. 適用於公司貸款的洗錢類型

Answer: (SHOW ANSWER)

Specialized AML training must be relevant to the specific risks the corporate banking team faces, including legal/regulatory expectations and the ML/TF typologies applicable to their products and customer base.

* Applicable AML laws and regulations (B): "Staff must be aware of the applicable AML/CFT laws and regulatory requirements relevant to their business area." (CAMS 6th Edition, Chapter: AML Training and Awareness)

* Money laundering typologies applicable to corporate loans (D): "Training should include typologies and red flags that are most relevant to the risks present in the specific business line, such as corporate lending." (CAMS 6th Edition, AML Training for High-Risk Departments) Incorrect Options:

* A: Monetary instrument reporting is more relevant to retail/branch banking.

* C: Regulatory exam best practices are for compliance teams, not business-line relationship managers.

References:

CAMS 6th Edition, AML Training and Awareness

FATF Guidance: Risk-Based Approach to Banking Sector

NEW QUESTION: 333

一家金融機構接受新的線上客戶。客戶提供可接受的身份證明後，機構應下一步

- A. 確認客戶資訊的有效性。
- B. 取得每位客戶的電子照片。
- C. 密切監控帳號 30 天。
- D. 根據提供的資訊建立帳號。

Answer: (SHOW ANSWER)

According to the CAMS Certification Package - 6th Edition¹, one of the essential components of customer due diligence is verifying the identity of the customer using reliable and independent sources. This verification process should be done before or during the establishment of the business relationship, and should not be delayed unless there is a low risk of money laundering or terrorist financing, and the delay is necessary to avoid interrupting the normal course of business. Therefore, after customers have provided acceptable identification, the financial institution should next confirm the validity of the customer information, as option A suggests. Option B is not necessary, as an electronic picture of each customer is not a mandatory requirement for customer verification, and may not be feasible or effective in some cases. Option C is not the next step, as closely monitoring the account for 30 days is part of the ongoing due diligence process, which should be performed after the customer verification is completed and the account is established. Option D is not advisable, as establishing the account based on the information provided without verifying its validity may expose the financial institution to money laundering and terrorist financing risks, and may violate the KYC and AML regulations.

1: CAMS Certification Package - 6th Edition | ACAMS, Chapter 3: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), pages 69-70.

NEW QUESTION: 334

電子商務平台固有哪些金融犯罪風險？（選擇四項）

- A. 電子商務平台被利用來轉移犯罪利益
- B. 使用被盜銀行卡進行網路購物
- C. 電子商務平台易受詐欺行為影響
- D. 電子商務平台被用作非法交易的幌子
- E. 電子商務平台鼓勵不受監管的點對點借貸
- F. 用外幣掩蓋犯罪所得

Answer: (SHOW ANSWER)

* A, B, C, D are all identified by CAMS 6th Edition and FATF as primary financial crime risks for e-commerce platforms:

* A: Platforms can be exploited to launder money by processing the movement of criminal proceeds under the guise of legitimate sales.

* B: Use of stolen credit/debit cards for online purchases is a common fraud and ML technique.

* C: Fraud schemes (such as chargebacks or fake listings) are widespread on e-commerce platforms.

* D: E-commerce platforms can serve as fronts for illicit goods or services, masking the true nature of transactions.

* E and F are not commonly cited as principal inherent risks in AML/CTF guidance.

References:

CAMS 6th Edition, E-commerce ML/TF Risks

FATF, "Money Laundering Risks Arising from E-commerce Activities"

NEW QUESTION: 335

故意違反反洗錢法的銀行員工會面臨哪些監理風險？

- A. 調口和聲譽損害
- B. 口業罰款與停職
- C. 刑事調口與監禁
- D. 執法行動，包括針對金融機構的罰款

Answer: (SHOW ANSWER)

A bank employee who willfully violates anti-money laundering laws faces the risk of criminal investigation and imprisonment, as these are serious offenses that could result in felony charges and penalties. According to the U.S. Department of Justice, individuals who knowingly violate the Bank Secrecy Act (BSA) or other anti-money laundering laws could face up to 10 years in prison and/or a fine of up to \$500,000¹. Similarly, in other jurisdictions, such as the UK, Canada, and Australia, individuals who commit money laundering offenses could face imprisonment and/or fines^{2,3,4}.

1: U.S. Department of Justice, Criminal Resource Manual, Title 18 U.S.C. 1956. Laundering of

Monetary Instruments, Section 2101 2: UK Government, Proceeds of Crime Act 2002, Part 7: Money Laundering Offences, Section 327-329 3: Government of Canada, Criminal Code, Part XII.1:

Laundering of Proceeds of Crime, Section 462.31 4: Australian Government, Criminal Code Act 1995, Chapter 10: National Infrastructure, Part 10.2: Money Laundering, Section 400.3-400.9 Penalties for

AML/CFT violations, including criminal and civil penalties, fines, jail terms, as well as internal sanctions, such as disciplinary action up to and including termination of employment.

NEW QUESTION: 336

一旦機構通報可疑活動，針對特定帳戶應採取下列哪項最佳措施？

- A. 通知客戶端交易已通報。
- B. 凍結資金，等待主管機關的通知。
- C. 保護所有支援文件。
- D. 立即關閉帳戶。

Answer: (SHOW ANSWER)

According to the BSA/AML Manual¹, once a financial institution files a SAR, it should maintain a copy of the SAR and the original or business record equivalent of any supporting documentation for a period of five years from the date of filing the SAR. The supporting documentation should be identified and maintained by the financial institution as such, and be deemed to have been filed with the SAR. The financial institution should make all supporting documentation available to FinCEN or any federal, state, or local law enforcement agency, or any federal regulatory authority that examines the financial institution for compliance with the BSA, upon request. Therefore, the best action to take regarding a particular account once suspicious activity is reported by the institution is to secure all supporting documentation, as it may be needed for further investigation or examination.

BSA/AML Manual¹

Suspicious Activity Reporting - Overview²

Suspicious Activity Report (SAR) Basics³

NEW QUESTION: 337

歐盟第四號反洗錢指令規定的貨幣門檻是多少？

- A. 3,000 歐元
- B. 5,000 歐元
- C. 10,000 歐元
- D. 15,000 歐元

Answer: (SHOW ANSWER)

The European Union Fourth Anti-Money Laundering Directive (4th AMLD) is a legal framework that aims to prevent the use of the Union's financial system for the purposes of money laundering and terrorist financing.

One of the provisions of the 4th AMLD is to lower the currency threshold for cash payments from €15,000 to

€10,000. This means that any person who makes or receives cash payments of €10,000 or more, whether in a single transaction or in several linked transactions, is subject to customer due diligence and record-keeping obligations. The 4th AMLD also extends its applicability to providers of gambling services, which are now listed as 'obliged entities'.

Directive - 2015/849 - EN - Fourth Anti-Money Laundering Directive - EUR-Lex, Article 11 and Recital 23.

EUR-Lex - 02015L0849-20210630 - EN - EUR-Lex, Article 11 and Recital 23.

Key elements of the 4th EU Anti-Money Laundering Directive, Section: Cash payments.

Anti-money laundering and countering the financing of terrorism legislative package, Section: New EU AML

/CFT Regulation.

Reference:<https://www.acams.org/aml-resources/eu-fourth-aml-directive/>

NEW QUESTION: 338

一家歐盟 (EU) 銀行與一家美國銀行有代理行關係。根據《美國愛國者法案》第 311 條，美國政府針對在歐盟銀行擁有應付帳口的指定實體採取了特別措施。關於歐盟銀行為指定實體提供的服務，美國銀行可能需要採取下列哪些行動？

- A. 確保指定實體的機密資訊不會與其他實體共用。
- B. 取得有關獲準使用此帳口的客戶的其他資訊。
- C. 驗證歐盟銀行是否為指定實體提供服務。
- D. 對歐盟銀行進行強化盡職調查。

Answer: (SHOW ANSWER)

Under USA PATRIOT Act Section 311, the U.S. government can impose special measures against a foreign jurisdiction, institution, or transaction that is of primary money laundering concern¹. These measures can range from requiring additional recordkeeping and reporting to prohibiting or restricting the opening or maintaining of correspondent or payable-through accounts for the designated entity². A payable-through account is a type of correspondent account that allows customers of a foreign bank to access the U.S. financial system by writing checks or making wire transfers from the foreign bank's account at a U.S. bank³.

In this case, the U.S. government has enacted special measures against a designated entity that has a payable-through account with an EU bank, which in turn has a correspondent banking relationship with a U.S. bank.

One of the possible actions that the U.S. bank might be required to take regarding the EU bank's services for the designated entity is to obtain additional information about customers permitted to use this account. This is to ensure that the U.S. bank can identify and monitor the transactions and activities of the designated entity and its customers, and to prevent any money laundering or terrorist financing risks⁴.

The other actions listed are not likely to be required by the U.S. government under Section 311.

Ensuring the designated entity's confidential information is not shared with other entities is not a special measure, but a general obligation of any financial institution under privacy laws. Verifying that the EU bank serves the designated entity is not a relevant action, since the U.S. government has already designated the entity as a primary money laundering concern. Performing enhanced due diligence on the EU bank is not a specific action related to the payable-through account, but a broader requirement for any correspondent account under Section 312 of the USA PATRIOT Act⁵.

1: USA PATRIOT Act | FinCEN.gov 2: 311 Actions | U.S. Department of the Treasury 3: Overview of Correspondent Banking and "De Risking" Issues - CRS Reports 4: U.S. TREASURY DEPARTMENT OFFICE OF PUBLIC AFFAIRS 5: Fact Sheet: Overview of Section 311 of the USA PATRIOT Act

NEW QUESTION: 339

關於金融機構向執法機構揭露可疑交易報告的支持文件，正確的情況是什麼？

- A. 盡快使用電子郵件提供文檔
- B. 金融機構可以將該請求通知帳戶持有人
- C. 確認請求來自執法機關的代表
- D. 也必須向帳戶持有人的律師提供所有已發布文件的副本

Answer: (SHOW ANSWER)

Before disclosing any supporting documentation for a suspicious transaction report (STR) to a law enforcement agency, the financial institution should confirm that the request is legitimate and authorized by verifying the identity and credentials of the requester¹. This is to prevent unauthorized access or misuse of the confidential information by impostors or fraudsters. The other options are not true, as they may either compromise the security, integrity, or timeliness of the disclosure, or violate the confidentiality or privacy rights of the customer.

ACAMS, CAMS Examination Study Guide, 6th Edition, Chapter 4, p. 117

FATF Guidance: The Role of Hawala and Other Similar Service Providers in Money Laundering and Terrorist Financing, October 2013², p. 20 Basel Committee on Banking Supervision, Sound management of risks related to money laundering and financing of terrorism, June 2017³, p. 11

Reference: <https://www.sec.gov/about/offices/ocie/aml2007/fin-2007-g003.pdf>

NEW QUESTION: 340

根據金融行動特別工作小組 40 項建議，指定非金融企業和專業人員包括哪些實體？

- A. 商品交易者
- B. 貨幣服務業務
- C. 哈瓦拉運算符
- D. 房地產經紀人

Answer: (SHOW ANSWER)

Bank A should file a suspicious transaction report (STR) on the transaction in Country A, as it is the financial institution that observes and processes the suspicious activity in its jurisdiction. According to the FATF Recommendations, financial institutions should report any transaction that they have reason to suspect is related to money laundering, terrorist financing, or other criminal activities, regardless of the amount involved¹. The STR should include information about the originator, the beneficiary, and the purpose of the transaction, as well as the reasons for suspicion². Bank A should also comply with any legal or regulatory requirements in Country A regarding the reporting of cross-border wire transfers³.

1: FATF Recommendation 20 - Reporting of suspicious transactions

2: FATF Interpretive Note to Recommendation 20

3: FATF Recommendation 16 - Wire transfers

Reference: [http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%](http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20)

20Recommendations%20(approved%20February%202012)%20reprint%20May%202012%20web
%20version.

pdf(page

19, DNFBPs: customer due diligence, bulleted point (b))

NEW QUESTION: 341

執法機構向金融機構提交多項請求。哪個請求是合法的並且需要銀行回應？

- A. 依法院命令凍結帳戶。
- B. 根據口頭請求保留帳號。
- C. 依書面請求扣押特權文件。
- D. 無需傳票即可出示文件和證詞。

Answer: (SHOW ANSWER)

A court order is a legal document issued by a judge or a magistrate that authorizes or requires a person or an entity to perform or refrain from performing a certain action. A court order to freeze an account is a legitimate request that requires the bank to comply, as it is a binding and enforceable order that may be issued for various reasons, such as preventing the dissipation of assets, preserving evidence, or facilitating the recovery of funds. A bank that receives a court order to freeze an account should follow its policies and procedures to verify the authenticity and validity of the order, and to implement the freeze as instructed by the order. A bank should also file a SAR if it suspects or has reason to suspect that the account is involved in suspicious or illicit activity.

The other options are not legitimate requests that require the bank to respond. A verbal request to keep an account open, a written request to seize privileged documents, or a request to produce documents and testimony without a subpoena are not legally binding or enforceable, and may violate the bank's obligations to protect the privacy and confidentiality of its customers. A bank may choose to cooperate with law enforcement in these situations, but it is not required to do so. A bank should also consider the potential risks and implications of maintaining an account or disclosing information that may be related to suspicious or illicit activity, and consult with its legal counsel as appropriate.

References:

Requests by Law Enforcement for Financial Institutions to Maintain Accounts Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations OCC Bulletin 2007-37: Requests by Law Enforcement for Financial Institutions to Maintain Accounts CAMS Certification Package - 6th Edition | ACAMS

NEW QUESTION: 342

為了確保遵守其經營所在地政府當局製定的經濟制裁，金融機構要求在入職時以及之後每季對所有新舊客戶進行篩選。

此步驟是否足以確保合規？

- A. 否，名單更新後應立即進行篩檢
- B. 是的，這是國際指南建議的
- C. 不，有必要對新的關係進行篩選和加強盡職調查

D. 是的，篩選所有現有客戶關係可確保機構不會與受制裁的個人或實體打交道

Answer: (SHOW ANSWER)

Screening customers at onboarding and quarterly thereafter is not sufficient to ensure compliance with economic sanctions, as sanctions lists may change frequently and the financial institution may not be aware of the latest updates. Screening should occur promptly after list updates to ensure that the financial institution is not dealing with a sanctioned individual or entity, or facilitating a prohibited transaction. This is recommended by the international guidance from the Financial Action Task Force (FATF) and the Wolfsberg Group¹². Screening and performing enhanced due diligence on new relationships is also important, but not the only step to ensure compliance.

CAMS Certification Package - 6th Edition | ACAMS, Chapter 3: Sanctions, page 86 The Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2014, Section 5: Sanctions Policy, page 12 ACAMS CAMS Certification Video Training Course - Exam-Labs, Video 3.1: Sanctions Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 109 The European Union Fourth Anti-Money Laundering Directive (4th AMLD) is a legal framework that aims to prevent the use of the Union's financial system for the purposes of money laundering and terrorist financing.

One of the provisions of the 4th AMLD is to lower the currency threshold for cash payments from €15,000 to

€10,000. This means that any person who makes or receives cash payments of €10,000 or more, whether in a single transaction or in several linked transactions, is subject to customer due diligence and record-keeping obligations. The 4th AMLD also extends its applicability to providers of gambling services, which are now listed as 'obliged entities'.

References:

Directive - 2015/849 - EN - Fourth Anti-Money Laundering Directive - EUR-Lex, Article 11 and Recital 23.

EUR-Lex - 02015L0849-20210630 - EN - EUR-Lex, Article 11 and Recital 23.

Key elements of the 4th EU Anti-Money Laundering Directive, Section: Cash payments.

Anti-money laundering and countering the financing of terrorism legislative package, Section: New EU AML

/CFT Regulation.

NEW QUESTION: 343

當客戶出現以下情況時，就會出現與藝術品購買相關的潛在洗錢的典型危險信號：

- A. 以匿名競標者的身分購買一幅畫，並提供財富來源。
- B. 要求分期付款並從兩個不同名稱的帳戶付款。
- C. 無故要求支付大量現金。
- D. 在拍賣會上為一幅畫支付的價格高於估計的最高價格。

Answer: (SHOW ANSWER)

Paying a large amount in cash for an art purchase is a typical red flag of potential money laundering, as it may indicate an attempt to avoid traceability and reporting requirements. Cash transactions are often used by criminals to launder illicit funds, as they are difficult to track and verify. According to the FATF guidance on money laundering and terrorist financing risks in the art trade, cash payments above a

certain threshold should be subject to enhanced due diligence and reporting obligations by art market participants (AMPs). AMPs should also be wary of customers who provide insufficient or inconsistent information about the source of funds, the purpose of the transaction, or the identity of the beneficial owner.

References:

Money Laundering and Terrorist Financing Risks and Vulnerabilities Associated with Gold, FATF, July 2023, p. 22-23.

Money Laundering and Terrorist Financing Vulnerabilities of Legal Professionals, FATF, June 2023, p. 38-39.

Red Flags Money laundering and terrorist financing risks, Responsible Art Market, 2017, p. 2.

NEW QUESTION: 344

銀行新任 KYC 主管特別注重加強其 KYC 計畫的風險管理部分，並參考巴塞爾委員會的客戶盡職調查 (CDD) 原則。

下列哪一項描述了巴塞爾委員會 CDD 原則中建立的 KYC 計劃的主要改進？（選兩個）

- A. 加強客戶接受政策，更清楚辨識高風險客戶
- B. 增加前台員工的訓練頻率
- C. 對先前已檢測並調查可疑活動的代理客戶建立黑名單。
- D. 加強客戶識別程序，以適當識別信託代理人和受託人帳戶

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 345

至少，誰應該接受針對特定角色的反洗錢訓練？（選三）

- A. 顧問
- B. 資訊技術人員
- C. 面對客戶的員工
- D. 董事會
- E. 人力資源人員
- F. 反洗錢/合規人員

Answer: ([SHOW ANSWER](#))

1. Information Technology Staff: These employees handle systems, databases, and software used for transaction monitoring, customer due diligence (CDD), and other AML processes. They need to understand how to configure and maintain AML systems, recognize suspicious patterns, and ensure data security.

2. Customer Facing Staff: Frontline employees, such as tellers, relationship managers, and customer service representatives, interact directly with customers. They play a crucial role in identifying red flags, conducting enhanced due diligence (EDD), and reporting suspicious activities. Training helps them recognize unusual behavior and follow proper procedures.

3. AML/Compliance Staff: These professionals are directly responsible for AML program management, policy development, and regulatory compliance. They need in-depth knowledge of AML laws,

regulations, and best practices. Training ensures they stay updated and can effectively implement AML controls.

References:

1. Financial Crime Academy: Ensuring Compliance - Building an Effective AML Training Program
2. ACAMS: AML Training - Preparing Auditors to Adequately Assess AML Programs
3. Financial Crime Academy: AML Training for High-Level Executives
4. Financial Crime Academy: Senior Management AML Training Workshops

NEW QUESTION: 346

當地執法人員通知銀行合規官員，他正在實施一項保險詐欺計劃，該計劃似乎正在使用銀行員工的帳戶進行交易。執法人員參考合規人員提交的可疑交易報告，並要求提供更多資訊。合規官應該採取什麼行動？

- A. 通知董事會
- B. 打電話給員工並要求解釋
- C. 立即允許存取銀行文件
- D. 根據正式書面請求向執法部門提供信息

Answer: (SHOW ANSWER)

the compliance officer should cooperate with the law enforcement investigation, but only after receiving a formal written request that specifies the scope and purpose of the information sought. This is to ensure that the compliance officer complies with the legal and regulatory obligations of the bank, such as confidentiality, privacy, and data protection. The compliance officer should also document the request and the information provided, and report the incident to the senior management and the board of directors as appropriate.

FFIEC BSA/AML Assessing the BSA/AML Compliance Program - BSA Compliance Officer, section "BSA Compliance Officer", paragraph 3: "The BSA compliance officer is responsible for ensuring that the bank's BSA/AML compliance program is implemented effectively, including timely updates in response to changes in regulations or business activities, and for managing all aspects of the BSA/AML compliance program. The BSA compliance officer is also responsible for ensuring that the bank's BSA/AML compliance program is communicated to all personnel and that adequate training is provided to appropriate personnel." Guidelines on the role of AML/CFT compliance officers, section "Guidelines on the role of AML/CFT compliance officers", paragraph 36: "The AML/CFT compliance officer should ensure that the institution cooperates with the competent authorities, including by providing them with all the information they require in a timely manner, in accordance with the applicable legal and regulatory framework." Anti-Money Laundering Compliance Officer Job Description, section "Responsibilities of an AML Compliance Officer", bullet point 6: "Cooperate with law enforcement and regulatory bodies as required."

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NEW QUESTION: 347

關於跨國機構有能力全面調查其所有海外業務中的異常活動的說法，哪一項是正確的？

- A. 當地隱私和資料保護法可能會阻止關聯公司共享資訊。
- B. 某些帳戶檔案可能僅以本機語言存儲，這將禁止全域評估。
- C. 機構應諮詢客戶並請求許可對所有帳戶進行全面調查。
- D. 全球機構總部國家/地區發布的企業範圍內的合規監督規則將優先於其他國家/地區的任何本地限制。

Answer: (SHOW ANSWER)

A multinational institution may face challenges in conducting a full investigation of unusual activity across its foreign operations, due to the different legal and regulatory frameworks that apply in each jurisdiction. One of the main obstacles is the local privacy and data protection laws that may restrict the access, transfer, or disclosure of customer information, especially personal or sensitive data, to other entities within the same group or to external parties, such as law enforcement or regulators. Therefore, the institution should be aware of the local laws and regulations that govern the collection, processing, and sharing of customer data, and ensure compliance with them¹².

ACAMS Study Guide, 6th Edition, page 191

Which statement about a multinational institution's ability to fully investigate unusual activity in all its foreign operations is correct? - Exam4Training Learn more

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multinational institution may face challenges in conducting a full investigation of unusual activity across its foreign operations, due to the different legal and regulatory frameworks that apply in each jurisdiction. One of the main obstacles is the local privacy and data protection laws that may restrict the access, transfer, or disclosure of customer information, especially personal or sensitive data, to other entities within the same group or to external parties, such as law enforcement or regulators. Therefore, the institution should be aware of the local laws and regulations that govern the collection, processing, and sharing of customer data, and ensure compliance with them¹².

References:

ACAMS Study Guide, 6th Edition, page 191

Which statement about a multinational institution's ability to fully investigate unusual activity in all its foreign operations is correct? - Exam4Training

NEW QUESTION: 348

與使用「哈瓦拉」相關的金融犯罪風險可能源自於：（選擇兩個）

- A. 難以追蹤交易的發起人、接收者和來源。
- B. 由第三方程式管理員進行遠端驗證。
- C. 高級政治人物大量使用。
- D. 用於正規銀行體系以外的跨國交易的非正式網路。
- E. 退回交易的風險增加。

Answer: (SHOW ANSWER)

* A: "Hawala and similar informal value transfer systems are difficult to monitor, making it challenging to identify the originator, recipient, and source of funds."

* D: "Hawala operates through informal networks for cross-border transfers, often outside the formal banking system, increasing AML/CFT risk."(CAMS 6th Edition, Alternative Remittance Systems; FATF, Guidance on Money Transfer Services) References:

CAMS 6th Edition, Money Transfer and Informal Value Transfer Systems

FATF, Alternative Remittance Systems Guidance

NEW QUESTION: 349

作為美國愛國者法案記錄保存要求的一部分，美國金融機構必須保留哪些資訊才能擁有外國代理帳戶？

- A. 識別每個外國銀行所有者的記錄
- B. 第 314(b) 條與外國代理帳戶相關的資訊分享結果
- C. 涉及外國代理帳戶購買 3,000 美元或以上的貨幣工具
- D. 提交的可疑活動報告以及涉及外國代理帳戶的證明文件

Answer: A (LEAVE A REPLY)

According to Section 319(b) of the USA PATRIOT Act, U.S. financial institutions that provide correspondent accounts to foreign banks must maintain records of the owners of the foreign banks and the name and address of a U.S. resident authorized to accept service of legal process for records regarding the correspondent accounts. This requirement is intended to prevent foreign shell banks from accessing the U.S. financial system and to facilitate the investigation and prosecution of money laundering and terrorist financing activities involving foreign banks.

US PATRIOT ACT | State Street

Foreign Correspondent Banking Fact Sheet - U.S. Department of the Treasury FACT SHEET for Section 312 of the USA PATRIOT Act Final Regulation and Notice of Proposed Rulemaking |

FinCEN.gov Reference: <https://www.moneylaunderingnews.com/2017/10/aml-information-sharing-in-the-u-s/>

NEW QUESTION: 350

高階管理層和董事會應在多大程度上參與 STR 的提交？

- A. 應告知他們所有重要的 STR 以及申請的數量和趨勢
- B. 應向他們提供機構提交的所有 STR 的副本
- C. 他們應審閱並批准所有 STR 的提交
- D. 他們應該是唯一指定與執法部門溝通的個人

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Certification Study Guide (6th edition), senior management and the Board of Directors have the ultimate responsibility for the effectiveness of the AML program and the compliance with the relevant laws and regulations. Therefore, they should be informed of all significant STRs and the numbers and trends of the filings, as this would help them to assess the level of risk exposure and the adequacy of the controls and resources. The other options are either too restrictive or too burdensome for senior management and the Board of Directors, and may interfere with the timely and confidential filing of STRs.

ACAMS CAMS Certification Study Guide (6th edition), page 361; ACAMS CAMS Certification Video Training Course, Module 2, Lesson 12

NEW QUESTION: 351

為了確保反洗錢計畫審計的獨立性，參與審計的人員最好被描述為：

- A. 不參與組織的可疑活動報告歸檔流程，並向組織的執行長報告
- B. 不參與組織的反洗錢合規計畫並向董事會或其委員會報告
- C. 不參與組織的反洗錢合規計畫，並向組織的執行長報告
- D. 不參與組織的可疑活動報告歸檔流程，並向董事會或其委員會報告

Answer: ([SHOW ANSWER](#))

NEW QUESTION: 352

銀行出納員收到警官的書面請求，要求在預先填寫的表格上審口以前客口的帳口，該表格上有警官的正式信箋抬頭。該官員懷疑前一位顧客正在從事小口行為。銀行出納員該採取什麼行動？

- A. 在 AML 合規性批准後提供警官資訊。
- B. 拒口請求並回報給合規官。
- C. 經管理階層批准後提供警官資訊。
- D. 將請求回報給合規官。

Answer: ([SHOW ANSWER](#))

the bank teller should not provide any information to the police officer without consulting the compliance officer first. The compliance officer is responsible for ensuring that the bank follows the applicable laws and regulations regarding customer privacy, dataprotection, and anti-money laundering. The compliance officer can verify the authenticity and validity of the request, determine the appropriate response, and obtain any necessary approvals or authorizations before releasing any information. The bank teller should not reject the request outright, as this could be seen as uncooperative or obstructive. The bank teller should also not provide the information after management approval, as this could bypass the compliance officer's role and expose the bank to legal or regulatory risks.

Bank Records and Financial Privacy Laws - FindLaw1

Anti-Money Laundering (AML) Risk Assessment | ACAMS2

What is the Difference Between Smurfing and Structuring?3

NEW QUESTION: 353

金融機構 (FI) 在同一管轄範圍口共享客口記錄之前應考慮哪些因素？

- A. 機構資訊共享實務的可用性
- B. 收集的客戶資料的完整程度
- C. 當地適用的有關客戶資訊揭露的限制
- D. 同一管轄範圍內潛在的不同時區

Answer: (SHOW ANSWER)

Before sharing customer records within the same jurisdiction, an FI should consider the legal and regulatory framework that governs the protection of personal data and the disclosure of client information. Different jurisdictions may have different laws and rules regarding the privacy and confidentiality of customer data, the consent and notification requirements for data sharing, the purposes and scope of data sharing, and the safeguards and accountability measures for data protection. An FI should ensure that it complies with the applicable restrictions and obligations when sharing customer records within the same jurisdiction, and that it does not violate the rights and expectations of its customers.

CAMS Study Guide - 6th Edition, Chapter 3, Section 3.4, page 83

CAMS Dumps Certified Anti-Money Laundering Specialist (the 6th edition), Question 352, page 8

CAMS Dumps Certified Anti-Money Laundering Specialist (the 6th edition), Question 352, page 8

NEW QUESTION: 354

哪一種情況最能證明金融機構可能關閉客戶帳戶的合理性？

- A. 該帳戶的交易觸發了多個可疑活動報告。
- B. 客戶使用與特別指定國民打交道的運輸公司。
- C. 客戶是民事傳票的對象。
- D. 此帳戶顯示定期固定金額的學費匯款。

Answer: (SHOW ANSWER)

Financial institutions closely monitor customer accounts for suspicious activity related to money laundering, terrorist financing, or other illicit activities. If an account consistently triggers multiple suspicious activity reports (SARs), it raises red flags. These reports indicate unusual or potentially illegal transactions, such as large cash deposits, frequent transfers to high-risk jurisdictions, or patterns inconsistent with the customer's profile. To mitigate risk and comply with anti-money laundering (AML) regulations, the financial institution may decide to close the account. Regular SAR filings are essential for maintaining the integrity of the financial system and preventing illicit financial flows¹².

References:

1. ACAMS: Suspicious Activity Reports (SARs)
2. MoneyLaundering.com: Suspicious Activity Reports

NEW QUESTION: 355

每季對位於具有貨幣報告門檻的司法管轄區的銀行的零售客戶帳戶進行一次審計。注意到其他機構提取的大量金融工具存款的金額低於限額。此活動不符合帳戶的歷史記錄。如果還發生了什麼，很可能會提交可疑交易報告？

- A. 客戶拖欠了銀行的大額貸款

- B. 存入的金融工具依序編號
- C. 在此期間有四筆存款超出了閾口
- D. 顧客購買金融工具3次超過門檻

Answer: (SHOW ANSWER)

A suspicious transaction report (STR) is a document that financial institutions must file with the relevant authorities when they detect or suspect any activity that may be related to money laundering, terrorist financing, or other criminal offences. An STR should include the details of the customer, the transaction, the reason for suspicion, and any other relevant information.

One of the indicators of suspicious activity is the use of financial instruments, such as checks, money orders, or cashier's checks, that are drawn on other institutions and deposited in amounts under the currency reporting thresholds. This may suggest that the customer is trying to avoid the detection and reporting of large cash transactions, which is a technique known as structuring or smurfing. Structuring is illegal and may indicate that the customer is laundering money from illicit sources or evading taxes. Another indicator of suspicious activity is the use of financial instruments that are sequentially numbered, meaning that they have consecutive serial numbers. This may suggest that the customer has obtained the instruments from the same source or issuer, and that they are using them to launder money or finance illegal activities. Sequentially numbered instruments may also indicate that the customer is involved in fraud, such as check kiting or counterfeit checks.

Therefore, if a bank conducts a quarterly review on a retail customer's account and finds that the customer has made a number of large deposits of financial instruments drawn on other institutions in amounts under the thresholds, and that the instruments were sequentially numbered, the bank will most likely file an STR. This is because this activity does not fit the customer's historical profile, and it raises a high level of suspicion that the customer is engaged in money laundering or other criminal activities.

CAMS Study Guide - 6th Edition, Chapter 4, Section 4.2, page 108

Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations, Question 5, page 7 Anti-money laundering - handling suspicious activity, Section 6.3, page 3 Tell us about suspicious activity that may be linked to money laundering, Section 3, page 1

NEW QUESTION: 356

哪些陳述描述了與國際商業公司相關的風險？（選兩個）

- A. 它們的取得成本低廉。
- B. 他們是一家離岸公司。
- C. 它們是在避口天堂創建的。
- D. 它們促進資口保護。
- E. 它們是由提名董事設立的。

Answer: (SHOW ANSWER)

International business corporations (IBCs) are entities that are created in jurisdictions that offer low or no taxes, high confidentiality, and minimal regulation. They are often used by individuals and

businesses to avoid or evade taxes, conceal assets, and launder money. Some of the risks associated with IBCs are:

They are created in a tax haven. Tax havens are countries or territories that have low or no taxes, lax financial regulation, and high secrecy. They attract IBCs that seek to reduce their tax liabilities, hide their beneficial owners, and evade scrutiny from authorities. Tax havens pose a risk to the global financial system, as they facilitate tax evasion, money laundering, corruption, and illicit financial flows¹².

They are established with nominee directors. Nominee directors are individuals who act as the legal representatives of an IBC, but have no actual control or authority over its activities. They are often used to shield the true beneficial owners of the IBC from detection and accountability. Nominee directors pose a risk to the transparency and integrity of the IBC, as they can enable fraud, tax evasion, money laundering, and other criminal activities³⁴.

References:

- 1, ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 2, page 38
- 2, ACAMS CAMS Certification Video Training Course, Module 2, Lesson 2.3, Offshore Financial Centers
- 3, ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 2, page 39
- 4, ACAMS CAMS Certification Video Training Course, Module 2, Lesson 2.4, Money Laundering Using New Payment Methods

NEW QUESTION: 357

在主管機關對客戶的活動進行持續調查期間，合規官員應

- A. 確保僅透過高階管理層與監管和執法機構進行溝通。
- B. 根據適用的當地法律，僅以書面形式與監管和執法機構進行溝通。
- C. 根據適用的當地法律與監管和執法機構溝通。
- D. 將與監管和執法機構的溝通限制在對最低限度。

Answer: (SHOW ANSWER)

A compliance officer should communicate with regulatory and law enforcement authorities in line with applicable local laws during an ongoing investigation into a client's activities by a competent authority. This is because the compliance officer has a duty to cooperate with the authorities and provide relevant information and documents as requested, while also protecting the confidentiality and privacy of the client and the institution. The compliance officer should not restrict the communication to senior management only, as this could hinder the investigation or create a perception of obstruction. The compliance officer should not communicate only in writing, as this could limit the effectiveness and timeliness of the communication. The compliance officer should not limit the communication to the absolute minimum, as this could imply a lack of cooperation or transparency.

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NEW QUESTION: 358

一家大型金融機構（佛羅裡達州）正在考慮將業務擴展到世界上反洗錢法律薄弱的地區。基於風險的評估表明，該位置將使佛羅裡達州的風險偏好超出規定的可接受金額。應使用哪些風險因素來決定 FI 的優先順序？

- A. 地理風險
- B. 未知的第三者風險
- C. 現金密集型企業風險
- D. 匿名交易風險

Answer: (SHOW ANSWER)

A: Geographic risks should be used to identify the priority of the FI in this scenario. According to the CAMS Manual (6th Edition), "Geographic risk refers to the possibility that the location of a customer, transaction, or product may increase the likelihood of money laundering or terrorist financing because of weak or nonexistent AML/CFT controls" (p. 59). In this scenario, the expansion to an area of the world with weak AML laws would increase the FI's geographic risk.

Reference: Certified Anti-Money Laundering Specialist (the 6th edition), Section 3.2.3 Geographic Risks, p. 59.

NEW QUESTION: 359

下列哪些是證券業可能存在洗錢行為的常見指標？
（選兩個）

- A. 配偶過世後，將證券存入現有經紀帳戶
- B. 允許固定收益證券到期
- C. 使用經紀帳戶，如存款帳戶
- D. 從事涉及被提名人或第三人的交易

Answer: (SHOW ANSWER)

NEW QUESTION: 360

反洗錢風險評估應何時更新？

- A. 每兩年
- B. 合併或收購後
- C. 董事會變更時
- D. 根據金融行動特別工作小組的指示

Answer: (SHOW ANSWER)

Evaluating the risk scoring model and conducting the risk assessment itself may need to be performed annually, every eighteen to twenty-four months, before the launch of a new product, or when an acquisition of another financial institution occurs.

Reference: <https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/faqs/17.%20Wolfsberg-Risk-Assessment-FAQs-2015.pdf> (10)

NEW QUESTION: 361

一家公司財務部門的一名員工聽到公司口部正在調口潛在詐欺行為的消息，便辭職並消失了。如果在員工離職前對他們進行觀察，那麼員工的哪些特徵會被視為危險訊號？（選兩個）

- A. 該員工對於離開前公司財務職位的原因始終含糊其辭。
- B. 該員工原本來自高風險管轄區。
- C. 該員工有朋友從事高風險行業。
- D. 該員工的生活方式與其收入相比過於奢侈。

Answer: (SHOW ANSWER)

Fraud and financial crime are often associated with sudden resignations, attempts to evade scrutiny, and financial behaviors inconsistent with legitimate income.

Option A (Correct): Being evasive about past employment suggests potential undisclosed misconduct.

Option D (Correct): Living beyond one's means is a major financial crime red flag, indicating possible fraud or illicit earnings.

Why Other Options Are Incorrect:

Option B (Incorrect): Nationality alone does not indicate fraud risk.

Option C (Incorrect): Having friends in high-risk industries is not necessarily a direct red flag.

Common Red Flags for Employee-Related Financial Crime:

Reluctance to take vacations or change roles (attempting to conceal wrongdoing).

Sudden resignation or disappearance following internal investigations.

Unusual financial activity, including large unexplained deposits.

Best Practices for Fraud Prevention in Corporations:

Regularly monitor employees in high-risk roles (e.g., finance, procurement).

Use whistleblower channels to detect internal misconduct.

Conduct thorough background checks before hiring employees.

Reference:

FATF Guidance on Internal Fraud and Money Laundering

Wolfsberg Group Best Practices for Employee Monitoring

Basel Committee Guidelines on Insider Financial Crime Risks

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NEW QUESTION: 362

美國一家金融機構的監管機構發現該機構未能建立和維持設計合理的反洗錢計畫。應採取哪些監理措施？
(選兩個)

- A. 刑事處罰
- B. 延期起訴協議
- C. 取得附加許可證
- D. 停止令
- E. 需要注意的事項

Answer: B,D ([LEAVE A REPLY](#))

A deferred prosecution agreement (DPA) is a type of enforcement action that allows a financial institution to avoid criminal prosecution if it admits to wrongdoing, pays a fine, and agrees to remediate its AML program deficiencies within a specified period of time¹. A cease and desist order (C&D) is another type of enforcement action that requires a financial institution to stop engaging in unsafe or unsound practices or violations of law, and to take corrective actions to address its AML program weaknesses². Both of these actions are commonly used by regulators to address serious or systemic AML program failures by financial institutions, as evidenced by recent cases^{3,4,5}.

References:

- 1: Deferred Prosecution Agreement - Wikipedia
- 2: FFIEC BSA/AML Appendices - Appendix R - Enforcement Guidance
- 3: FinCEN Announces \$15 Million Civil Money Penalty against Bancredito International Bank for Willful Violations of the Bank Secrecy Act
- 4: Lessons From The Seven Largest AML Bank Fines In 2021
- 5: Fines for AML Compliance Failures - ACAMS Today

NEW QUESTION: 363

金融行動特別工作小組 (FATF) 40 項建議的特點是什麼？

- A. 它們使 FATF 能積極參與執法事務、調口或起訴。
- B. 它們會自動轉化為歐盟成員國和美國的當地法律。
- C. 它們提供了有效的反洗錢監管框架的強制性要求清單。
- D. 它們包含反洗錢的全球標準，並獲得世界各地政府機構的認可。

Answer: ([SHOW ANSWER](#))

The characteristic of the Financial Action Task Force (FATF) 40 recommendations is that they comprise global standards for countering money laundering, recognized by government bodies across the world. The FATF 40 recommendations provide a comprehensive framework of measures that countries should implement to combat money laundering and terrorist financing. The recommendations are not mandatory, but are widely recognized and followed by countries across the globe. The recommendations cover a range of areas, including customer due diligence, record-keeping, suspicious activity reporting, and international cooperation.

NEW QUESTION: 364

歐盟信託和公司服務提供者 (TCSP) 分析師在查看客戶的財務報表和詳細總帳時注意到一些異常活動。該客戶從事機械進出口業務。哪些交易指標需要進一步回報給合規官？

- A. 控股公司向子公司提供的公司間貸款，用於為機械運輸提供資金。
- B. 海外虛擬辦公室服務的支付。
- C. 向在外國司法管轄區設立的不相關公司和服務提供者支付諮詢費。
- D. 向有效司法管轄區的外國公司支付公司秘書聘用費。

Answer: (SHOW ANSWER)

According to the CAMS Study Guide, one of the methods to launder money using TCSPs is to create a complex web of transactions involving multiple entities and jurisdictions, often using shell companies and nominees. The payment of consultancy fees to unrelated companies and service providers established in a foreign jurisdiction could be a sign of such a scheme, as it could be used to disguise the origin and destination of illicit funds, or to evade taxes and regulations. Therefore, this transaction indicator warrants further escalation to the compliance officer.

CAMS Study Guide, 6th Edition, Chapter 2, page 69.

NEW QUESTION: 365

金融機構收到有關客戶的大陪審團傳票時應採取哪些行動？

- A. 影印客戶的文件並將原件提交給執法機關。
- B. 在提交文件之前通知接受調查的客戶。
- C. 根據執法機構的口頭要求，保持客戶的帳戶處於開放狀態。
- D. 讓機構指定的法律顧問審閱傳票。

Answer: (SHOW ANSWER)

A financial institution should consult with its legal counsel before responding to a grand jury subpoena regarding a customer, as such subpoenas may involve complex legal issues and potential conflicts of interest.

A grand jury subpoena is a legal order issued by a federal or state grand jury that compels a person or entity to produce documents, testify, or both, in connection with a criminal investigation. A financial institution that receives a grand jury subpoena should not disclose its existence or contents to the customer or any third party, unless authorized by law or the court, as doing so may constitute obstruction of justice or violate the secrecy rules of the grand jury. A financial institution should also assess and review all relevant information it has about the customer that is the subject of the subpoena, in accordance with its risk-based AML program, and consider filing a SAR if it identifies any suspicious activity.

References:

1: This article provides an overview of the legal and practical considerations for financial institutions when responding to subpoenas, including the types of subpoenas, the rules that apply, the confidentiality and privilege issues, and the procedural steps to follow.

2: This document provides answers to frequently asked questions regarding SARs and other AML considerations, including the question of how to handle grand jury subpoenas and other law enforcement inquiries.

NEW QUESTION: 366

在為在美國設有分行的外國銀行製定反洗錢計畫時，美國愛國者法案要求的四個最低要素包括下列哪些內容？

1. 制定「了解你的客戶」計畫。
2. 持續的員工培訓計畫。
3. 指定合規官員。
4. 獨立的審計功能來測試程序。

- A. 僅限 1、2 和 3
- B. 限 1、2 和 4
- C. 僅限 1、3 和 4
- D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

According to the USA PATRIOT Act, the four minimum elements required for an anti-money laundering program for a foreign bank with branches in the United States are:

An ongoing employee training program. This is to ensure that the employees are aware of the anti-money laundering policies and procedures, the legal and regulatory requirements, the red flags and indicators of suspicious activity, and their roles and responsibilities in detecting and reporting money laundering and terrorist financing.

The designation of a compliance officer. This is to ensure that there is a person responsible for overseeing the implementation and effectiveness of the anti-money laundering program, ensuring compliance with the applicable laws and regulations, and liaising with the regulators and law enforcement agencies.

An independent audit function to test the program. This is to ensure that the anti-money laundering program is periodically reviewed and evaluated by an independent and qualified auditor, who can assess the adequacy and effectiveness of the program, identify any weaknesses or deficiencies, and recommend corrective actions or improvements.

The development of internal policies, procedures, and controls. This is to ensure that the foreign bank has a written and documented anti-money laundering program that establishes the standards, guidelines, and processes for preventing, detecting, and reporting money laundering and terrorist financing, and that the program is consistent with the risk profile and business activities of the foreign bank.

The development of a Know Your Customer program is not a minimum element required under the USA PATRIOT Act, although it is a recommended best practice and may be required by other laws or regulations.

CAMS Study Guide - 6th Edition, Chapter 5, pages 141-142

CAMS Certification Exam Outline, Domain 2, Task 2.2, Skill 2.2.1

Anti-Money Laundering Initiatives Under the USA Patriot Act, FindLaw, March 2008

[The U.S. PATRIOT Act and AML: What You Need to Know], Dow Jones Risk & Compliance, June 2020

NEW QUESTION: 367

三個人進入賭場，用現金購買了價值 2 萬美元的籌碼。三人使用 200 美元的籌碼玩遊戲，然後合併資金申請賭場支票。暗示洗錢的潛在危險訊號是什麼？

- A. 三人用現金買了籌碼，然後開始賭博
- B. 三人進行了最低程度的賭博，並結合資金請求賭場檢口所提供的籌碼
- C. 三人使用價值 200 美元的籌碼進行賭博，然後申請退款
- D. 三人購買了價值 20,000 美元的籌碼，並要求賭場檢口剩餘籌碼

Answer: (SHOW ANSWER)

The potential red flag that alludes to money laundering is option B, where the trio engage in minimal gambling and combine the funds to request a casino cheque for the chips presented. This behavior is indicative of structuring, which involves breaking down large transactions into smaller ones to avoid detection by the casino and regulatory authorities. The fact that the trio only used a small amount of chips to play games, and then combined their funds to request a casino cheque, raises suspicions that they may be attempting to disguise the origin of their funds.

NEW QUESTION: 368

大量傳入電匯會引起有關客戶的警報。資金立即以現金提取和電匯方式記入借方。為了調查此警報/案例，應先查看哪些資訊？

- A. 客戶資料
- B. 不良媒體搜索
- C. 帳戶活動
- D. 開源訊息

Answer: C (LEAVE A REPLY)

When a high volume of incoming wire transfers generates an alert about a client and the funds are immediately debited by cash withdrawals and outgoing wire transfers, the first information that should be reviewed to investigate this alert/case is the customer's account activity. This is because the account activity can reveal the origin, destination, purpose, frequency, and amount of the wire transfers, as well as any unusual or inconsistent patterns that may indicate money laundering or fraud. The account activity can also help to compare the wire transfers with the customer's profile, risk rating, expected behavior, and source of funds.

Reviewing the account activity can help to determine if the alert is a false positive or a true positive, and if further investigation or reporting is required.

References:

CAMS Study Guide, 6th Edition, Chapter 4, Section 4.3.2, p. 1251

Investigating Alert/Case of High Volume Wire Transfers | CAMS Exam Prep2 Wire Transfer Red Flags: Money Laundering & Fraud Risks - Alessa3

NEW QUESTION: 369

為什麼司法互助條約 (MLAT) 是國際合作的門戶？

- A. 它們為傳送可用於起訴和司法程序的證據提供了法律依據
- B. 他們從金融機構接收可疑交易報告，並分發給當地執法部門和外國金融情報機構
- C. 他們取得可能口生證據的情報
- D. 他們發布金融情報機構 (FIU) 之間資訊交換的 Prmc4es

Answer: (SHOW ANSWER)

A Mutual Legal Assistance Treaty (MLAT) is an agreement between two or more countries for the purpose of gathering and exchanging information in an effort to enforce public or criminal laws¹. MLATs provide a legal basis for transmitting evidence that can be used for prosecution and judicial proceedings, such as witness statements, bank records, search and seizure orders, and asset forfeiture². MLATs also facilitate the cooperation and coordination between law enforcement authorities of different jurisdictions in investigating and prosecuting transnational crimes, such as money laundering, terrorist financing, corruption, and cybercrime³. The other options are incorrect because:

B). MLATs do not receive reports of suspicious transactions from financial institutions, but rather request specific information or evidence from foreign authorities. Financial institutions report suspicious transactions to their domestic Financial Intelligence Units (FIUs), which may then share the information with foreign FIUs through other mechanisms, such as the Egmont Group or bilateral agreements⁴.

C). MLATs do not obtain intelligence that might lead to evidence, but rather request evidence that is already available or can be obtained by foreign authorities. Intelligence is a broader term that refers to any information that is relevant to the security or interests of a country, and may not be admissible as evidence in a court of law⁵. Intelligence may be obtained through other means, such as covert operations, surveillance, or informants⁶.

D). MLATs do not issue the Principles of Information Exchange Between Financial Intelligence Units (FIUs), but rather follow them. The Principles of Information Exchange are a set of guidelines that were adopted by the Egmont Group of FIUs in 2001, and aim to enhance the cooperation and communication among FIUs in exchanging financial information and intelligence⁷. The Principles of Information Exchange are not legally binding, but rather reflect the best practices and standards of the FIU community.

1: Mutual legal assistance treaty - Wikipedia

2: FREQUENTLY ASKED QUESTIONS REGARDING LEGAL ASSISTANCE IN CRIMINAL MATTERS, page 1

3: The Mutual Legal Assistance Problem explained | wilmap

4: ACAMS, CAMS Certification Package - 6th Edition, Chapter 4, page 125

5: Intelligence - Wikipedia

6: Intelligence cycle - Wikipedia

7: Egmont Group of Financial Intelligence Units - Wikipedia

Principles for Information Exchange Between Financial Intelligence Units for Money Laundering and Terrorism Financing Cases

NEW QUESTION: 370

根據巴塞爾銀行監理委員會標準，哪些陳述最能描述與客戶盡職調查 (CDD) 政策和程序相關的良好實踐？ (選擇三項。)

FreeExam.com

- A. 銀行應根據基於一般規則的評估來識別客戶，而不考慮帳戶的預期規模和用途。
- B. 銀行不應允許在建立業務關係後完成驗證，因為這對於正常開展業務來不是必需的。
- C. 銀行應考慮偶爾的銀行交易或帳戶規模/水平，以了解客戶的概況和行為。
- D. 銀行應制定並實施明確的受理政策和程序，以識別可能對恐怖主義融資或洗錢構成較高風險的客戶類型。
- E. 銀行應針對與高風險客戶建立業務關係實施強化的盡職調查措施，例如高階管理層的批准。
- F. 當銀行處理共享客戶的資金遵循相同標準時，應使用基於另一家銀行標準的CDD 程序。

Answer: (SHOW ANSWER)

According to the Basel Committee on Banking Supervision standards, the following statements best describe sound practices in relation to customer due diligence (CDD) policies and procedures: Banks should take into consideration the occasional banking transaction or the size/level of assets to build an understanding of the customer's profile and behavior. This is because the nature and frequency of transactions and the size of the account balance may indicate the level of risk associated with the customer and the need for ongoing monitoring¹ Banks should develop and implement clear acceptance policies and procedures to identify the types of customer that are likely to pose a higher risk of financing terrorism or money laundering. This is because banks should not enter into or maintain relationships with customers who pose unacceptable risks to the bank or the financial system. Banks should also apply a risk-based approach to CDD and apply more stringent measures to higher-risk customers² Banks should implement enhanced due diligence measures for entering business relationships with high-risk customers, such as approval by senior management. This is because banks should ensure that they have adequate information and controls to manage the risks posed by such customers and to comply with the relevant laws and regulations. Senior management should be involved in the decision-making process and be accountable for the outcomes²

1: Basel Committee on Banking Supervision, Consolidated KYC Risk Management, October 2004, page 6-

7. 2: Basel Committee on Banking Supervision, Customer due diligence for banks, October 2001, page 8-9.

NEW QUESTION: 371

健全的客戶盡職調查計畫的三個要素是什麼？

- A. 確定金融機構將接受哪種類型的客戶
- B. 關於如何以及在何種程度上識別潛在客戶的培訓
- C. 取得潛在客戶的出生日期和地址
- D. 決定機構中的誰應分配給潛在客戶作為聯絡人

Answer: (SHOW ANSWER)

A sound Customer Due Diligence Program (CDD) is a key component of an effective anti-money laundering and counter-terrorism financing (AML/CFT) framework. According to the Financial Action Task Force (FATF), the global standard-setter for AML/CFT, CDD involves the following elements¹: Identifying the customer and verifying their identity using reliable, independent sources of information or documents.

Identifying the beneficial owner and taking reasonable measures to verify their identity, so that the financial institution understands who ultimately owns or controls the customer or the funds.

Understanding and obtaining information on the purpose and intended nature of the business relationship.

Conducting ongoing due diligence on the business relationship and scrutinizing transactions to ensure that they are consistent with the financial institution's knowledge of the customer, their business and risk profile, and the source of funds.

Therefore, the three elements of a sound CDD program that are listed in the question are:

Determination of what type of customer the financial institution will accept: This involves defining the customer acceptance policy and risk appetite of the financial institution, and applying appropriate risk-based measures to accept or reject customers based on their risk profile and the financial institution's ability to manage and mitigate those risks².

Training as to how and to what extent to identify prospective customers: This involves providing adequate and regular training to the staff who are responsible for conducting CDD, and ensuring that they are aware of the legal and regulatory requirements, the internal policies and procedures, the risk indicators, the verification methods, and the reporting obligations³.

Obtaining date of birth and address of a prospective customer: This is part of the basic information that is required to identify and verify the customer's identity, and to establish their risk profile and the source of funds. The date of birth and address can also be used to check against various databases and watchlists to detect any potential matches with sanctioned or high-risk individuals or entities⁴.

The element that is not part of a sound CDD program is:

Determination of who in the institution should be assigned to the prospective customer as a liaison:

This is not a mandatory or essential element of CDD, although it may be a good practice to assign a dedicated relationship manager or contact person to each customer, especially for high-risk or complex customers, to ensure effective communication, monitoring, and service delivery.

FATF Guidance on Customer Due Diligence and Financial Inclusion 1

ACAMS Study Guide for the CAMS Certification Examination (6th Edition), Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) 2

ACAMS Study Guide for the CAMS Certification Examination (6th Edition), Chapter 4: Developing an AML

/CFT Program 3

ACAMS Study Guide for the CAMS Certification Examination (6th Edition), Chapter 5: Conducting and Supporting the Investigation Process 4 Wolfsberg Group Guidance on Customer Due Diligence (CDD)

NEW QUESTION: 372

一家新公司在銀行開設了帳戶。經過一個月的活動後，該帳戶將轉交給反洗錢調查，以了解潛在的人口販運活動。哪些危險訊號最有可能觸發推薦？

(選兩個)

- A. 與鑽石管道中的國家進行大量貿易
- B. 該國邊境的幾筆現金存款被第三方迅速提取_多次購買等於或略低於報告門檻的虛擬貨幣
- C. 在同一天的企業異常時間支付多筆住宿和食品費用

D. 無需造訪分公司即可在線上進行企業交易

Answer: (SHOW ANSWER)

The red flags that most likely triggered the referral are:

B: Several cash deposits along the country's border that are quickly withdrawn by third parties. C.

Several lodging and food payments made on the same day at unusual hours for a business.

Red flag B suggests possible structuring activity, where individuals are trying to avoid currency transaction reporting requirements by depositing and withdrawing cash in amounts below the reporting threshold. This activity is often associated with money laundering and could indicate human trafficking activity.

Red flag C suggests unusual activity that may be indicative of human trafficking, such as lodging and food payments made at unusual hours or in unusual patterns. This type of activity could indicate that the business is being used as a front for human trafficking or that the individuals involved in the trafficking are using the business to facilitate their activities.

NEW QUESTION: 373

金融機構 (FI) 在決定完成內部反洗錢調和向金融情報部門(FIU) 提交可疑活動報告(SAR) 的時間表時應採用哪些做法？

A. 遵守當地有關報告期間的監理要求。

B. 30 天內報告 SAR。

C. 根據調和的複雜度使用矩陣。

D. 根據高階經理的專業判斷採取行動。

Answer: (SHOW ANSWER)

The timely filing of SARs is legally mandated, and financial institutions must follow jurisdiction-specific reporting deadlines.

Option A (Correct): Regulatory requirements dictate SAR filing deadlines (e.g., in the U.S., SARs must be filed within 30 calendar days of detecting suspicious activity).

Option B (Incorrect): 30 days is the U.S. standard, but different jurisdictions may have different SAR deadlines (e.g., EU AMLD mandates prompt reporting).

Option C (Incorrect): Complexity-based reporting delays are not permitted if they exceed regulatory timelines.

Option D (Incorrect): Relying solely on professional judgment rather than regulatory rules can lead to non-compliance.

SAR Filing Deadlines in Different Jurisdictions:

Jurisdiction

SAR Filing Deadline

United States (FinCEN)

30 calendar days (60 days if no suspect is identified)

United Kingdom (FCA/NCA)

As soon as practicable

European Union (6 AMLD)

"Promptly" (no fixed number of days)

Australia (AUSTRAC)

3 business days for terrorism financing, 14 business days for other cases

Why Timely SAR Filing Matters:

Delays in reporting can result in regulatory penalties.

Early SAR filing enables FIUs to take swift action against financial crime.

Non-compliance can lead to fines, criminal charges, and reputational damage.

Reference:

FATF Recommendation 20 (Reporting Suspicious Transactions)

FinCEN SAR Filing Requirements

6th EU Anti-Money Laundering Directive (6AMLD)

NEW QUESTION: 374

執法部門正在秘密調查 20 名涉嫌參與犯罪網路的個人，這些人涉嫌為網路犯罪分子洗錢數千萬歐元。銀行的反洗錢專家在得知警報後需要採取哪些行動？（選兩個）

- A. 讓銀行的法律和合規職能部門參與進來，以解決問題的嚴重性。
- B. 在銀行的客戶資料平台上進行搜索，以確定銀行是否與指定個人有任何業務往來。
- C. 向銀行的所有客戶顧問發送電子郵件，要求提供有關任何個人的資訊。
- D. 僅在調查結果具有任何意義時才將其報告給執法部門。
- E. 回應執法部門，他們在沒有司法命令的情況下提出請求將違反銀行對其客戶的《一般資料保護條例》義務。

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Study Guide, 6th Edition, Chapter 4, Section 4.2, the AML Specialist at a bank should take the following actions upon receiving a confidential alert from law enforcement about suspected money launderers:

Involve the bank's legal and compliance function to address the gravity of the matter and ensure that the bank's response is appropriate and lawful. The legal and compliance function can also advise on the bank's obligations and rights under the relevant laws and regulations, such as the General Data Protection Regulation (GDPR), the Bank Secrecy Act (BSA), and the USA PATRIOT Act.

Perform a search on the bank's client data platform to determine if the bank has had any business with the named individuals or any related parties. The search should include current and past accounts, transactions, wire transfers, and other relevant records. The AML Specialist should also review any existing customer due diligence (CDD) and enhanced due diligence (EDD) information on the potential suspects and update them as necessary.

The other options are not recommended or required actions for the AML Specialist at a bank in this scenario:

Sending out an email to all of the bank's client advisors to request information on any of the individuals could compromise the confidentiality of the alert and expose the bank to legal and reputational risks. It could also alert the suspects or their associates and hinder the law enforcement investigation.

Reporting findings back to law enforcement only if they are of any significance is not sufficient or compliant with the bank's obligations to cooperate with law enforcement and report any suspicious

activity. The AML Specialist should report any relevant information or findings to law enforcement as soon as possible, regardless of their significance, and follow the established procedures and protocols for information sharing and reporting.

Responding to law enforcement that their request without a judicial order would breach the bank's GDPR duty with respect to its clients is not accurate or helpful. The GDPR does not prohibit the bank from sharing personal data with law enforcement for the purposes of preventing, detecting, or investigating money laundering or other criminal activities, as long as the bank has a legal basis and safeguards for doing so. The bank should consult with its legal and compliance function to determine the best way to respond to the law enforcement request and balance its GDPR obligations with its anti-money laundering (AML) duties.

References:

ACAMS CAMS Study Guide, 6th Edition, Chapter 4, Section 4.2

General Data Protection Regulation (GDPR)

Bank Secrecy Act (BSA)

USA PATRIOT Act

NEW QUESTION: 375

哪些活動需要更新第一線培訓計畫？

- A. 實施新系統，提供監控客戶帳戶的資訊。
- B. 擴展到將使用新建立的產品的客戶群。
- C. 維護客戶群入職文件收集的監理要求。
- D. 先前經過審計和風險評級的新客戶類型的引入。

Answer: (SHOW ANSWER)

The first line training program is the training that is provided to the employees who are directly involved in the day-to-day operations of the business, such as sales, customer service, or compliance staff¹. The first line training program should cover the essential knowledge and skills that are required for the employees to perform their roles effectively and in compliance with the anti-money laundering and counter-terrorism financing (AML/CFT) policies and procedures of the organization². The first line training program should also be updated regularly to reflect any changes in the business environment, the regulatory framework, the customer base, the products and services, or the risk assessment of the organization².

Among the four activities listed, the one that would require an update to the first line training program is the expansion to customer segments that will utilize newly established products. This is because the new customer segments and products may pose different or higher AML/CFT risks than the existing ones, and the employees need to be aware of these risks and how to mitigate them. For example, the new customer segments may include politically exposed persons, non-resident customers, or high-net-worth individuals, who may have higher exposure to corruption, tax evasion, or fraud risks³. The new products may include prepaid cards, mobile payments, or cryptocurrencies, which may have higher vulnerability to money laundering, terrorist financing, or cybercrime risks. Therefore, the first line training program should be updated to include the relevant information and guidance on how to identify,

verify, monitor, and report these new customer segments and products, and how to apply the appropriate customer due diligence and transaction monitoring measures².

The other three activities do not necessarily require an update to the first line training program, unless they involve significant changes in the AML/CFT policies and procedures of the organization. The implementation of a new system that provides information for monitoring customer accounts may improve the efficiency and effectiveness of the existing AML/CFT processes, but it does not change the nature or level of the AML/CFT risks. The maintenance of regulatory requirements for onboarding documentation collections of a customer base is a routine and ongoing task that should already be covered by the existing first line training program.

The onboarding of a new customer type which was previously reviewed and risk rated does not introduce any new AML/CFT risks, as long as the risk rating and the corresponding controls are consistent with the organization's risk appetite and policy.

1: What is First Line of Defense? | Definition and Overview

2: Training and Awareness | FATF

3: Politically Exposed Persons (Recommendations 12 and 22) | FATF

Guidance for a Risk-Based Approach to Virtual Assets and Virtual Asset Service Providers | FATF

NEW QUESTION: 376

一家持有離岸牌照的外國銀行想要在美國銀行開立代理帳戶。該外資銀行計劃向部分客戶提供帳戶支付服務。

根據《美國愛國者法案》，外國銀行必須向美國銀行提供什麼？

- A. 代理銀行所有者政治敏感人物名單
- B. 金融機構將使用透過帳戶付款的帳戶持有人列表
- C. 在美國可以接收代理銀行法律程序服務的人員
- D. 金融機構監控帳戶支付交易員工反洗錢訓練紀錄清單

Answer: (SHOW ANSWER)

Under the USA PATRIOT Act, a U.S. bank that maintains a correspondent account for a foreign bank operating under an offshore license must obtain from the foreign bank the name and address of a person residing in the United States who is authorized to accept service of legal process for records related to the correspondent account¹. This requirement is intended to facilitate the U.S. authorities' access to information and records regarding the correspondent account and its underlying transactions, especially in cases where the foreign bank is located in a jurisdiction that does not cooperate with U.S. law enforcement or regulatory requests².

USA PATRIOT Act, Section 319(b)(2)(A)¹

ACAMS, CAMS Examination Study Guide, 6th Edition, Chapter 5, pp. 151-152

Reference: https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/CBDDQ-Capacity-Building/Wolfsberg%27s_CBDDQ_Capacity_Building_Guidance_Final%20V1.1.pdf

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NEW QUESTION: 377

離岸司法管轄區的一家銀行與一家機構接洽，希望建立新的代理銀行關係。在開立帳戶之前，新客戶代表獲得離岸銀行的反洗錢政策和程序的副本，以及銀行的所有適當的法律文件；確定沒有第三方能存取該帳戶；並確定銀行的所有者、銀行的主要業務活動、銀行的營業地址。巴塞爾銀行監理委員會的銀行客戶盡職調查建議銀行家在開設石油代理帳戶之前採取下列哪些步驟？

1. 進行實地考察並親自會見所有委託人和受益所有人。
2. 驗證銀行在其註冊所在國擁有實體機構。
3. 確認銀行受到充分的反洗錢法的監管。
4. 取得並維護代理銀行客戶的完整名單，包括政治人物。

- A. 僅限 1 和 2
- B. 僅限 1 和 4
- C. 僅限 2 和 3
- D. 僅限 3 和 4

Answer: (SHOW ANSWER)

The Basel Committee on Banking Supervision's Customer Due Diligence for Banks Paper recommends that banks should verify the bank has a physical presence in the country where it is incorporated and confirm the bank is subject to regulatory supervision with adequate anti-money laundering laws before opening a correspondent account. These steps are intended to prevent the establishment of relationships with shell banks, which are banks that have no physical presence in any country and are not affiliated with a regulated financial group. Shell banks pose a high risk of money laundering and terrorist financing, as they can be used to hide the identity and source of funds, evade regulatory oversight, and facilitate illicit transactions.

Therefore, banks should conduct enhanced due diligence on correspondent banks that operate in offshore jurisdictions, where the regulatory standards and transparency may be lower or insufficient. ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 4, Section 4.3.1, p. 1091 ACAMS CAMS Certification Exam Outline, 6th Edition, Domain 2, Task 2.2, p. 52 Basel Committee on Banking Supervision, Customer Due Diligence for Banks, October 2001, p. 13-143

NEW QUESTION: 378

哪種方法可以顯示潛在的洗錢和恐怖主義融資活動？

- A. 客戶在單筆交易中將 500 歐元混合面額紙幣兌換成小面額美國紙幣
- B. 從事出口業務的商業客戶定期收到來自高風險國家的電匯

- C. 一位未知客戶在一天內為一個人購買了多種貨幣工具
- D. 未知客戶支付 1,000 美元現金以緊急轉帳至高風險國家/地區

Answer: (SHOW ANSWER)

This method is indicative of potential money laundering and terrorist financing activity because it involves several red flags, such as:

The use of cash, which is anonymous and difficult to trace

The urgency of the transfer, which may suggest a need to move funds quickly before they are detected

The destination of the transfer, which may be a high risk country with weak anti-money laundering

(AML) and counter-terrorism financing (CTF) controls or sanctions

The lack of information about the client and the beneficiary, which may indicate a lack of due diligence or customer identification

These factors may indicate that the client is trying to conceal the source, ownership, or purpose of the funds, or that the funds are related to illicit activities such as money laundering or terrorist financing.

ACAMS CAMS Certification Video Training Course¹, Module 2: Money Laundering Risks and Methods,

Lesson 2.2: Money Laundering Methods ACAMS CAMS Study Guide, 6th Edition², Chapter 2: Money Laundering Risks and Methods, Section 2.2:

Money Laundering Methods, pp. 35-36

ACAMS CAMS Examination Preparation Seminar, 6th Edition³, Chapter 2: Money Laundering Risks and Methods, Section 2.2: Money Laundering Methods, Slide 14

NEW QUESTION: 379

下列哪些屬性可以增強反洗錢計畫的有效性？

- A. 為所有員工提供基本的反洗錢培訓
- B. 反洗錢官員被任命為董事會成員，擁有更大的權力
- C. 審計員在審計結果不盡人意之後，為該計劃提供規範性指導和支持
- D. 為反洗錢員工提供有效的挑戰和持續的交叉培訓

Answer: (SHOW ANSWER)

Effective AML programs promote a culture of compliance, which includes an environment where staff are empowered to raise concerns, challenge decisions, and continuously improve through cross-functional learning. Providing effective challenges is a supervisory expectation and best practice in institutions that value AML governance integrity.

While AML officer authority (option B) supports oversight, it is not as impactful on daily operational effectiveness as fostering a challenging and adaptive compliance culture.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: AML Program Components - Section: Culture of Compliance

NEW QUESTION: 380

在哪兩種情況下，執法部門可以存取金融機構客戶的財務記錄？（選兩個。）

- A. 如果此人出現在可疑交易報告中
- B. 如果執法部門發出合法傳票或傳票
- C. 如果對客戶的調查在媒體上公開
- D. 如果執法單位有間接證據懷疑洗錢行為

Answer: (SHOW ANSWER)

Q Law enforcement may be given access to a financial institution customer's financial records if they serve a legal summons or subpoena, or if they have circumstantial evidence to suspect money laundering. These are two of the exceptions to the general rule that financial institutions must protect the privacy of their customers' financial information under the Right to Financial Privacy Act (RFPA) of 1978. The RFPA also allows access to customer records in other situations, such as with the customer's consent, in response to judicial orders, or for certain intelligence or counterintelligence purposes¹.

Option A is incorrect because a suspicious transaction report (STR) does not automatically grant law enforcement access to the customer's financial records. The STR is a confidential document that is filed by the financial institution to the Financial Intelligence Unit (FIU) of the country, and the FIU may decide to share the information with law enforcement if it deems appropriate². However, law enforcement still needs to follow the RFPA procedures to obtain the customer's records from the financial institution.

Option C is incorrect because the investigation of a customer being made public in the media does not give law enforcement the right to access the customer's financial records. The media exposure may raise the public interest or the urgency of the investigation, but it does not override the RFPA requirements. Law enforcement still needs to obtain a legal summons, subpoena, or other valid authorization to access the customer's records from the financial institution.

References:

1: Right to Financial Privacy Act of 1978, 12 U.S.C. §§ 3401-3422 2: ACAMS Study Guide for the CAMS Certification Examination, 6th Edition, Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), p. 47

NEW QUESTION: 381

關於外國資口管制辦公室 (OFAC) 制裁, 下列哪一項敘述是正確的?

(選兩個)

- A. 制裁只能針對 OFAC 指定的外國特定個人
- B. 凍結的資金必須存入金融機構帳簿上的有利息的帳口
- C. 制裁可以是全面的, 也可以是選擇性的, 透過凍結資口和限制貿易來實現外交政策和國家安全目標
- D. 除非國會續簽, 否則OFAC 制裁將在五年後自動失效

Answer: (SHOW ANSWER)

OFAC sanctions are a key element of the U.S. AML/CFT framework. According to the CAMS 6th Edition and OFAC regulations:

* Blocked funds must be placed into an interest-bearing account on a financial institution's books (B): "Blocked property must be held in a separate interest-bearing account on the books of the U.S. financial institution." (CAMS 6th Edition, Sanctions Compliance; OFAC FAQs)

* Sanctions can be either comprehensive or selective using the blocking of assets and trade restrictions (C): "OFAC administers both comprehensive and targeted (selective) sanctions programs to fulfill U.S. foreign policy and national security goals." (CAMS 6th Edition, Sanctions Compliance) Incorrect

Options:

* A: OFAC can sanction entities, vessels, and organizations-not just individuals or those in foreign countries.

* D: There is no automatic expiration of OFAC sanctions after five years.

References:

CAMS 6th Edition, OFAC and Sanctions Programs

U).S. Treasury, OFAC FAQs

NEW QUESTION: 382

哪些活動可能被視為潛在的魚叉式網路釣魚詐騙？（選三）

- A. 一名員工接到電話，要求匯款以幫助陷入困境的人。
- B. 快遞員向企業發送重複發票，其中包含現有供應商的更新付款詳細資訊。
- C. Payroll 收到一封來自員工的外部電子郵件，希望更新其銀行帳戶資訊。
- D. 企業向其員工發送一封電子郵件，警告必須更改電子郵件密碼以防止網路詐欺。
- E. 員工收到一封要求下載附件的電子郵件，但該附件是惡意軟體。
- F. 宗教組織的成員透過電子郵件收到聲稱來自其領導人的捐款請求。

Answer: (SHOW ANSWER)

The activities that could be considered a potential spear phishing scam are:

A courier delivers a duplicate invoice to a business that contains updated payment details of an existing supplier. This could be a way of diverting funds to a fraudulent account by impersonating a legitimate vendor and exploiting the trust relationship between the business and the supplier¹.

Payroll receives an external email from an employee looking to update their bank account information. This could be a way of stealing money from the employee or the employer by pretending to be the employee and requesting a change in the payment method or destination².

An employee receives an email that asks to download an attachment, but the attachment is a malware. This could be a way of infecting the employee's computer or network with malicious software that could compromise sensitive data, disrupt operations, or demand ransom³.

The other options are not necessarily spear phishing scams, although they may be other types of fraud or deception. For example:

An employee receives a phone call requesting that money be sent to assist someone in trouble. This could be a vishing scam, which is a form of voice phishing that uses phone calls to solicit personal or financial information or to request money transfers⁴.

A business sends its employees an email warning that email passwords must be changed to prevent cyber- fraud. This could be a legitimate security measure, or it could be a phishing scam, which is a form of email phishing that targets a broad audience and tries to trick them into revealing their credentials or clicking on malicious links.

Members of a religious organization receive a donation request by email claiming to be from their leader. This could be a genuine appeal, or it could be a social engineering scam, which is a form of manipulation that exploits the human factor and relies on the victim's emotions, trust, or sympathy.

References:

ACAMS CAMS Certification Video Training Course - Exam-Labs3

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)4 ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 3, page 53: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-3.pdf> ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 3, page 54: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-3.pdf> ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 3, page 55: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-3.pdf> ACAMS Study Guide for the Certification Examination, 6th Edition, Chapter 3, page 56: <https://www.acams.org/wp-content/uploads/2019/08/ACAMS-Study-Guide-6th-Edition-Chapter-3.pdf>

NEW QUESTION: 383

根據埃格蒙特集團原則，金融情報機構（FIU）之間應進行資訊交換：

- A. 對所提供的財務和管理資訊的數量設定限制。
- B. 僅當外國金融情報機構的地位與執法相關時。
- C. 自由地、自發地、根據要求、在互惠的基礎上。
- D. 不期望在如何使用資訊方面實現互惠。

Answer: (SHOW ANSWER)

Under the Egmont Group Principles, information exchange among financial intelligence units (FIUs) should be conducted freely, spontaneously, and upon request, on the basis of reciprocity. This means that FIUs should be willing to share information without the expectation of reciprocity on how the information will be used. The goal is to facilitate the cooperation and exchange of information among FIUs to combat money laundering, terrorist financing, and other financial crimes.

NEW QUESTION: 384

下列哪一個屬於洗錢的金融階段？

- A. 集成
- B. 結構化
- C. 離岸外包
- D. 展示位置

Answer: (SHOW ANSWER)

According to the CAMS study guide, chapter 1, page 91, placement is the first stage of money laundering, where the illicit funds are introduced into the financial system. This stage involves the highest risk of detection, as the money launderers may use various methods to avoid suspicion, such as structuring, commingling, or using cash-intensive businesses. Placement is followed by layering and integration, which are the second and third stages of money laundering, where the illicit funds are moved and disguised through multiple transactions and entities, and then integrated into the legitimate economy as seemingly legal assets.

The other options are not the financial stages of money laundering, although they may be related to some aspects or techniques of money laundering. Option A, integration, is the final stage of money laundering, not the first. Option B, structuring, is a method of placement, not a stage of money laundering. Structuring, also known as smurfing, is the practice of breaking down large amounts of cash

into smaller deposits or transactions to avoid reporting thresholds or scrutiny. Option C, off shoring, is a term that refers to the relocation of assets or activities to another jurisdiction, usually for tax or regulatory advantages. Off shoring may be used by money launderers to exploit the differences or loopholes between jurisdictions, but it is not a stage of money laundering.

1: ACAMS CAMS Study Guide - 6th Edition, Chapter 1, page 9: <https://www.acams.org/wp-content/uploads/2019/09/ACAMS-CAMS-Study-Guide-6th-Edition-Chapter-1.pdf>

NEW QUESTION: 385

某個組織正在製定一個全面的反洗錢 (AML) 框架。

下列哪一項敘述最能描述反洗錢政策和程序之間的關係？

- A. 政策是廣泛的指導方針。程序是針對具體流程的詳細口明。只有程序才是知識和遵守的強制性要求。
- B. 政策定義了組織的原則並影響程序的起草。程序是對特定過程的詳細口明。
- C. 政策是針對特定流程的詳細口明。程序是一個總體框架。

政策和程序都不是強制要求了解和遵守的

- D. 政策是針對特定流程的詳細口明，程序是一個總體框架，政策和程序對於知識和遵守都是強制性的

Answer: (SHOW ANSWER)

NEW QUESTION: 386

在實施成功的反洗錢計畫時，董事會的職責之一是：

- A. 確保任命合格的首席反洗錢官。
- B. 創造基於利潤預期的合規文化。
- C. 管理合規計畫的日常流程。
- D. 聘請第三方公司負責反洗錢合規性。

Answer: A (LEAVE A REPLY)

The Board of Directors is the primary governing body of a financial institution and has the fiduciary duty to oversee and approve the BSA/AML compliance program. One of the key responsibilities of the Board is to ensure the appointment of a qualified chief AML officer who has the authority, expertise, and resources to implement and manage the BSA/AML program effectively. The chief AML officer is accountable to the Board and senior management for the performance of the BSA/AML program and should report regularly on the status, issues, and challenges of the program. The Board should also evaluate the chief AML officer's performance and provide feedback and guidance as needed.

The Board's Role in AML Compliance

Board Member Responsibilities for BSA/AML Compliance

Responsibilities of the Board of Directors in Implementing a Successful AML Program

NEW QUESTION: 387

一套全面的基於風險的維護業務關係的指導方針正在製定中。

哪一種情況表示機構應終止與客戶的關係？

- A. 客戶在恐怖組織活躍的國家開展業務。

- B. 客戶進行的國際金融交易超過 5 億美元。
- C. 客戶超出了規模和複雜性不相似的另一家機構創建的可接受風險模型的標準。
- D. 客戶超出了機構創建的可接受風險模型的標準，並且未執行可接受的補救措施

Answer: (SHOW ANSWER)

According to the risk-based approach, financial institutions should apply enhanced due diligence and ongoing monitoring to higher-risk clients, and take appropriate measures to mitigate the risks of money laundering and terrorist financing. If the client exceeds the criteria of an acceptable risk model created by the institution, the institution should communicate the issues to the client and request remedial actions, such as providing additional information, documentation, or evidence of compliance. If the client does not cooperate or comply with the institution's requirements, the institution should consider terminating the relationship with the client, as the risk may outweigh the benefits of continuing the business relationship.

ACAMS CAMS Certification Package - 6th Edition, Chapter 2: Risk Assessments, pp. 51-521
ACAMS CAMS Certification Package - 6th Edition, Chapter 4: Customer Due Diligence, pp. 97-981
ACAMS CAMS Certification Video Training Course, Module 2: Risk Assessments, Lesson 2.3: Risk-Based Approach
ACAMS CAMS Certification Video Training Course, Module 4: Customer Due Diligence, Lesson 4.3:

Enhanced Due Diligence

Reference:

<http://www.fatf-gafi.org/media/fatf/documents/reports/Risk-Based-Approach-Banking-Sector.pdf>

NEW QUESTION: 388

哪項法規允許金融機構在向美國財政部發出通知後相互共享信息，以便識別並向聯邦政府報告可能涉及洗錢或恐怖活動的活動？

- A. 歐洲議會條例 (EU) 2024/1624
- B. 洗錢/恐怖主義融資 (ML/TF) 資訊與個案的協作分享 (COSMIC)
- C. 美國愛國者法案第 314(a) 條
- D. 美國愛國者法案第 314(b) 條

Answer: (SHOW ANSWER)

USA PATRIOT Act Section 314(b) allows financial institutions to voluntarily share information with one another, after notifying the U.S. Treasury, to identify and report possible money laundering or terrorist financing activities.

Key elements include:

Voluntary participation

Prior notice to FinCEN (part of the U.S. Treasury)

Protection from liability when acting in good faith

Enhanced collaborative detection across institutions

Section 314(a) refers to information sharing between law enforcement and financial institutions, not peer-to-peer sharing.

COSMIC is an initiative in certain jurisdictions like Singapore, not U.S. regulation.

Regulation (EU) 2024/1624 is part of the EU AML framework, not relevant to U.S. institutions.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter:U.S. Regulatory Framework-
Section:USA PATRIOT Act - Information Sharing under Section 314(b)

NEW QUESTION: 389

歐盟第四個反洗錢指令的發布為成員國的程序帶來了哪些改變？（選兩個）

- A. 報告可疑交易的門檻從 15,000 歐元降至 10,000 歐元。
- B. 所有金融機構都必須辨識並驗證法人實體的受益所有人。
- C. 洗錢和恐怖主義融資被定義為單獨的犯罪行為，擴大了指令的措施範圍。
- D. 義務實體的範圍從賭場擴大到所有賭博服務提供者。
- E. 可以從客觀事實情況推論出對犯罪行為的了解。

Answer: (SHOW ANSWER)

According to the Certified Anti-Money Laundering Specialist (the 6th edition), Section 2.2.2 The EU Fourth AML Directive, the release of the EU's Fourth AML Directive resulted in the threshold for reporting suspicious transactions decreasing from 15,000 EUR to 10,000 EUR (Answer A) and all financial institutions were required to identify and verify the beneficial owner of legal entities (Answer B). The directive also defined money laundering and terrorist financing as separate crimes, which expanded the directive's measures (Answer C). Answer D is incorrect as the scope of obliged entities was not enlarged from casinos to all providers of gambling services, but rather to all providers of payment services. Answer E is also incorrect as the directive does not provide that knowledge of criminal conduct can be inferred from objective factual circumstances. Reference: Certified Anti-Money Laundering Specialist (the 6th edition), Section 2.2.2 The EU Fourth AML Directive, p. 12.

NEW QUESTION: 390

當使用比特幣等虛擬資產來資助恐怖主義時，可以使用哪種策略來確保虛擬資產不會被執法部門輕易扣押？

- A. 使用自架錢包建立許多不同的不斷更新的捐款地址
- B. 發布與中心化虛擬資口服務提供者的帳口關聯的捐款地址
- C. 在多個捐款活動和媒體類型中使用相同的捐款地址
- D. 與擁有強大 KYC 流程的虛擬資口服務提供者建立關係以避免懷疑

Answer: (SHOW ANSWER)

Using self-hosted wallets, or wallets that are stored on the user's computer, is one of the tactics that may be used to finance terrorism with virtual assets such as Bitcoin. By creating many different donation addresses that are updated continuously, law enforcement will have a harder time tracing transactions. It is also important to note that using the same donation address across multiple donation campaigns and media types, as well as forming relationships with virtual asset service providers that have strong KYC processes in place, can draw attention from law enforcement and should be avoided.

NEW QUESTION: 391

個人在金融機構以最低限度的現金存款開設帳口。他出示了外國護照，並表示他將在當地工作數月。他還要求提供有關進行電子資金轉帳的資訊。該機構隨後無法核實該個人提供的就業或居住資訊。此後不久，一大筆轉帳被送到客口的帳口。下列何者是巴塞爾銀行監理委員會對銀行客口盡職調口建議的行動方案？

- A. 將存款記入帳口並通知客口存款已完成。
- B. 實施強化的盡職調查程序以監控帳口是否有可疑活動。
- C. 關閉帳口並將資金退還至資金來源。
- D. 透過向客口發送帳口中全額金額的支票（支票）來結束關係

Answer: (SHOW ANSWER)

According to the Basel Committee on Banking Supervision's Customer Due Diligence for Banks¹, banks should have policies and procedures to identify and manage high-risk customers, such as those who provide false or incomplete information, have complex opaque beneficial ownership structures, or are involved in large or unusual transactions. In such cases, banks should apply enhanced due diligence measures, such as obtaining additional information or documentation, verifying the source and purpose of funds, conducting more frequent and intensive monitoring of account activity, and reporting any suspicious transactions to the relevant authorities. Therefore, the best course of action for the bank in this scenario is to implement enhanced due diligence procedures to monitor the account for suspicious activity, as option B suggests.

Option A is not recommended, as it would imply that the bank accepts the customer without verifying his identity and background, which would expose the bank to money laundering and terrorist financing risks.

Option C is not advisable, as it would terminate the relationship without investigating the origin and destination of the funds, which could hinder the efforts of law enforcement agencies to trace and recover illicit assets. Option D is also not appropriate, as it would involve sending a check to a customer whose address and identity are not confirmed, which could facilitate money laundering and fraud.

5: Customer due diligence for banks - Bank for International Settlements, October 2001, pages 8-9, 13-14.

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NEW QUESTION: 392

一位反洗錢專家指出，特定分公司的可疑交易報告備案量大幅減少。下列哪一項行動最適合？

- A. 將分公司列入監視列表，以確保在下一季進行審核。
- B. 分析分支活動報告以確定分支活動是否減少。
- C. 查看分行異常報告，以確定根據客口資料的活動變化。
- D. 檢視員工記錄，看看是否有缺乏經驗的人員在未經適當訓練的情況下擔任關鍵職位。

Answer: (SHOW ANSWER)

A significant reduction in suspicious transaction report (STR) filings at a particular branch could indicate that the branch is not properly identifying and reporting suspicious activities, or that the branch is experiencing a change in customer behavior or risk profile. Therefore, the most appropriate action for an anti-money laundering specialist is to review the branch exception reports, which are reports that highlight transactions or activities that deviate from the expected or normal patterns, based on the customer profiles and risk assessments. By reviewing the branch exception reports, the specialist can determine whether there are any changes in activity that warrant further investigation or reporting, or whether there are any gaps or weaknesses in the branch's compliance program or procedures. The other options are not as appropriate as reviewing the branch exception reports, as they do not directly address the issue of suspicious activity reporting. Placing the branch on the watchlist may be a subsequent action, but it does not provide immediate insight into the reason for the reduction in STR filings. Analyzing the branch activity reports may show whether there has been a decrease in branch activity, but it does not explain why the activity has decreased, or whether the remaining activity is suspicious or not. Reviewing the staff records may reveal whether inexperienced personnel are in critical positions without appropriate training, but it does not account for other factors that may affect the branch's compliance performance, such as management oversight, internal controls, or customer risk. ACAMS CAMS Certification Study Guide (6th edition), page 361; ACAMS CAMS Certification Video Training Course, Module 2, Lesson 12; What Is a Suspicious Activity Report (SAR)? Triggers and Filing3; Reporting suspicious transactions to FINTRAC4.

NEW QUESTION: 393

哪一個準確地描述了洗錢的社會和經濟影響？

- A. 洗錢會影響金融部門，而金融部門對於經濟成長至關重要。
- B. 外國投資者往往被洗錢活動嚴重的司法管轄區所吸引，因為同樣的條件有利於合法的經濟活動。
- C. 洗錢者通常會透過幌子公司匯出其經營所在司法管轄區應繳納的所有口款。
- D. 洗錢活動的增加通常會帶來更大的經濟穩定性，因為利潤會在管轄範圍內再投資。

Answer: (SHOW ANSWER)

Money laundering has a significant negative impact on the financial sector by undermining the integrity of financial markets. It distorts asset and commodity prices and leads to the misallocation of resources, which can dampen economic growth. The process also erodes public trust in the financial system and can deter foreign investment.

NEW QUESTION: 394

與代理銀行客戶的財務經理保持良好關係的客戶官員得知，執法部門已要求代理銀行提供許多記錄。為了與客戶保持良好的關係，客戶官員召開會議與客戶討論法律請求。客戶官員打算在會議期間討論與調查相關的要點。

反洗錢專家該推薦什麼？

- A. 討論執法部門正在調查的所有要點，以確保代理行在接洽時做好充分準備。
- B. 讓客戶經理的經理知道與客戶進行了哪些對話，並相應地記錄客戶文件。
- C. 限制與客戶討論調查，並確保客戶經理已向客戶提供適當的通知。

D. 取消了會議，因為他已經透過提醒調口來表現不當

Answer: (SHOW ANSWER)

the account officer should avoid disclosing any details of the investigation to the customer, as this could compromise the integrity of the law enforcement inquiry, or even constitute tipping off, which is a criminal offense in many jurisdictions¹². The account officer should only inform the customer that a legal request has been made, and that the bank is obliged to comply with it, without revealing the nature or scope of the request³. The account officer should also document the communication with the customer, and report it to the appropriate internal authority, such as the compliance officer or the legal department⁴.

1: CAMS Study Guide, 6th Edition, Chapter 5: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), page 151-152. 2: Tipping Off: What It Is and How to Avoid It, ACAMS Today, March 2019. 3: How to Handle Law Enforcement Requests, ACAMS Webinar, June 2018. 4: Best Practices for Responding to Law Enforcement Inquiries, ACAMS White Paper, October 2017.

NEW QUESTION: 395

用於檢測結構化交易的最有效工具是

- A. 資金來源驗證。
- B. 全面的開口程序。
- C. 用於偵測可疑交易的員工訓練計畫。
- D. 可以連結明顯不相關的交易的軟體程式。

Answer: D (LEAVE A REPLY)

Structured transactions are a common method of money laundering, where large amounts of cash are broken down into smaller deposits or withdrawals to avoid reporting thresholds or detection. The most effective tool to detect such transactions is a software program that can link apparently unrelated transactions by using various criteria, such as customer name, address, account number, identification number, transaction amount, date, time, location, etc. Such a program can help identify patterns, trends, and anomalies that may indicate money laundering activity.

ACAMS CAMS Certification Study Guide¹, Chapter 2: Money Laundering Risks and Methods, Section 2.2:

Common Money Laundering Methods, pp. 51-52

ACAMS CAMS Certification Video Training Course², Module 2: Money Laundering Risks and Methods, Lesson 2.2: Common Money Laundering Methods ACAMS CAMS Certification Exam Outline³, Domain 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Task 2.2: Implement risk-based CDD, EDD and ongoing due diligence policies, procedures and processes, p. 13

NEW QUESTION: 396

合規計畫應如何應對反洗錢審計結果？

- A. 利用調口結果來辨識並評估洗錢風險

- B. 透過關閉受到調口結果影響的帳口
- C. 在審計報告中為每項發現提供建議
- D. 透過提名獨立方來實施糾正措施

Answer: (SHOW ANSWER)

An AML audit is a process of evaluating an organization's compliance with AML regulations and best practices. The audit report should provide feedback on the strengths and weaknesses of the organization's AML program and identify any gaps or deficiencies that need to be addressed. The compliance program should use the audit findings as an opportunity to improve its AML risk management and internal controls, and to implement corrective actions as needed. The audit findings should not be ignored or dismissed, but rather used as a tool to enhance the organization's AML compliance performance and effectiveness.

References:

1: This web page explains what an AML compliance program is, why it is important, and what are the key components of an effective program. It also states that an AML compliance program should involve a regular review of the internal controls and systems used to detect and report financial crime, and measure their effectiveness in meeting compliance standards.

2: This blog post provides an overview of the importance and steps of an AML audit, and how to perform one effectively. It also suggests that an AML audit is a starting point to strengthen and improve the AML program, and that the insights from the audit should prompt action by the compliance team to address the deficiencies discovered.

3: This blog post discusses the best practices for AML audit compliance, and emphasizes the need for an ongoing testing process, including the audit, to keep the AML program current and effective. It also recommends effective communication among all employees who follow the program and procedures.

NEW QUESTION: 397

國際清算銀行為哪個組織提供秘書處？

- A. 巴塞爾委員會
- B. 金融行動特別工作小組
- C. 沃爾夫斯堡集團
- D. 埃格蒙特集團

Answer: (SHOW ANSWER)

Reference:<http://www.bis.org/bcbs/about.htm>(4th para)

Basel Committee on Banking Supervision (Basel Committee) The Basel Committee was established by the G-

10's central bank of governors in 1974 to promote sound supervisory standards worldwide. Its secretariat is appointed by the Bank for International Settlements in Basel, Switzerland.

NEW QUESTION: 398

一家美國銀行最近收到監管命令，要求整改反洗錢計劃，其中包括多項違法行為。銀行的高階主管和員工可能面臨何種程度的問責？

- A. 如果銀行指定的反洗錢合規官和高階主管在知悉銀行存在反洗錢違規行為的情況下未能採取行動，他們可能承擔個人責任。
- B. 該銀行指定的反洗錢合規官很可能面臨刑事起訴，因為該銀行收到了監管命令。
- C. 銀行指定的反洗錢合規官是公司高階管理團隊中唯一因違反反洗錢法而承擔個人責任的個人。
- D. 銀行指定的反洗錢合規官和高階主管可能因違反反洗錢法而面臨民事起訴，但不會面臨刑事起訴。

Answer: (SHOW ANSWER)

Senior management and AML officers may face personal liability if they knowingly allow AML violations to persist.

Option A (Correct): If senior management or the AML officer was aware of violations and failed to act, they could face regulatory or criminal liability.

Option B (Incorrect): Criminal liability depends on intent and negligence-an AML officer is not automatically prosecuted because a bank receives a regulatory order.

Option C (Incorrect): Liability extends beyond the AML officer-other senior executives can also be held accountable.

Option D (Incorrect): Violations can result in both civil and criminal prosecution, depending on the severity.

Legal Risks for AML Compliance Failures:

Civil penalties (fines and sanctions) for AML program deficiencies.

Criminal charges if executives knowingly ignore violations.

Regulatory enforcement actions leading to license revocation.

Reference:

USA PATRIOT Act Section 352 (AML Compliance Program Requirements)

FinCEN Guidelines on AML Compliance Officer Liability

FATF Recommendation 35 (Sanctions for AML Non-Compliance)

NEW QUESTION: 399

當考慮在整個機構或同一司法管轄區內共享資訊時，對共享客戶相關資訊構成挑戰的關鍵法律問題是什麼？

- A. 資料保護與隱私權法
- B. 消費者保護法
- C. 與反洗錢法規衝突
- D. 技術不一致與挑戰

Answer: (SHOW ANSWER)

When considering sharing information across the institution or within the same jurisdiction, the key legal issue that poses challenges to sharing customer-related information is data protection and privacy laws. Data protection and privacy laws exist in most countries and can vary significantly from jurisdiction to jurisdiction.

These laws place restrictions on how customer data can be used, shared, and stored, and can limit the ability of financial institutions to share customer-related information with each other. Additionally, these laws may also require financial institutions to take additional steps to ensure the protection of customer data.

NEW QUESTION: 400

哪些透過存款機構洗錢的方式與國際貿易密切相關？

- A. 成立空殼公司
- B. 使用黑市比索兌換
- C. 建構現金存款提款
- D. 以非法資金投資合法業務

Answer: (SHOW ANSWER)

The Black Market Peso Exchange (BMPE) is a trade-based money laundering technique commonly used by narcotics traffickers in Colombia and Mexico. The central feature uses a money trader to ensure that US drug sales revenue doesn't cross any borders. Instead, those dollars are used to purchase any number of legitimate commodities from unsuspecting businesses on behalf of legitimate South American businesspersons, whose legitimate imports are used to obtain pesos for the drug cartels. This method is closely associated with international trade because it involves the exchange of goods and currencies across different countries, and it exploits the discrepancies between the official and unofficial exchange rates.

CAMS Certification Package - 6th Edition | ACAMS, Chapter 2: Money Laundering Risks and Methods, page

35

Black Market Peso Exchange in Money Laundering - Financial Crime Academy What is BMPE ? -

Sanction Scanner Overview - FinCEN.gov Reference:http://fraudaid.com/Dictionary-of-Financial-Scam-Terms/black_market_peso_exchange.htm

NEW QUESTION: 401

下列哪一項是全球組織在管理跨多個司法管轄區的 AFC 和製裁合規性時需要考慮的關鍵因素？

- A. 僅依賴聯合國等國際機構來確保遵守制裁，因為不需要遵守當地法律
- B. 確保集團政策和程序優先遵守美國法規，因為它們是全球最具影響力的
- C. 應用全球 AFC 和製裁政策以確保一致性，而無需適應當地法規
- D. 確保集團政策符合每個國家特定的反洗錢和製裁法規

Answer: (SHOW ANSWER)

Global organizations must ensure their policies and procedures comply with local laws and regulations in each country where they operate, even when maintaining group-wide consistency. Relying solely on international or U.S. standards does not ensure compliance with all local requirements, which may be more stringent or specific.

"A global group-wide program should ensure adherence to local AML and sanctions laws and regulations in every jurisdiction in which it operates. Local adaptation of policies is essential to address jurisdiction-specific risks and legal requirements." (CAMS 6th Edition, International AML/CFT

Standards; FATF Recommendations 18, 35; EU & US Sanctions Regulations) References:

CAMS 6th Edition, Compliance Across Jurisdictions

FATF Recommendation 18: Internal Controls and Foreign Branches

Basel Committee on Banking Supervision (BCBS) Guidance

NEW QUESTION: 402

最近的一項活動解釋了洗錢者如何利用代理銀行業務，之後，一名反洗錢專家決定重新制定與外國金融機構簽訂協議的盡職調查程序。為了建立嚴格的「了解您的受訪者」程序，應包含下列哪些資訊？

1. 被告的經營管理、許可性質、主要經營活動。
2. 電腦設備和軟體能力。
3. 母國監管品質。
4. 受訪者的位置，特別是真實的實際存在。

- A. 僅限 1、2 和 3
- B. 限 1、2 和 4
- C. 僅限 1、3 和 4
- D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

These are the information that can help the correspondent bank to assess the risk profile, the regulatory compliance, and the operational capacity of the respondent bank, and to verify its identity and legitimacy. The correspondent bank should obtain and verify the following information about the respondent bank:

- * Respondent's management, nature of license, and major business activity. This can help the correspondent bank to understand the governance, the legal status, and the core functions of the respondent bank, and to evaluate its reputation, integrity, and competence.
- * The quality of supervision in the home country. This can help the correspondent bank to determine the level of oversight and regulation that the respondent bank is subject to, and to identify any potential gaps or weaknesses in the anti-money laundering and counter-terrorist financing (AML/CTF) framework of the home country.
- * Respondent's location, in particular the existence of a real physical presence. This can help the correspondent bank to verify the actual existence and operation of the respondent bank, and to avoid dealing with shell banks or banks located in high-risk or non-cooperative jurisdictions.

The other option is not necessarily information that should be included to establish a rigorous "Know Your Respondent" procedure, although it may have some relevance or importance depending on the circumstances and the nature of the correspondent relationship. Option 2 describes computer equipment and software capability, which may be useful to assess the technical and operational compatibility and efficiency of the respondent bank, but it is not essential to evaluate its risk or compliance level.

ACAMS CAMS Certification Video Training Course - 6th Edition¹

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)² ACAMS CAMS Study Guide - 6th Edition, Chapter 7, pages 154-155

<https://www.acams.org/wp-content/uploads/2019/09/ACAMS-CAMS-Study-Guide-6th-Edition-Chapter-7.pdf>

NEW QUESTION: 403

金融情報機構埃格蒙特集團 (Fills) 的哪些原則旨在最大限度地擴大 FLU 之間的合作，以更有效地打擊洗錢？（選兩個）

- A. 消除 FLU 之間自發性的資訊分享，以減輕過多調口工作的負擔。
- B. 資訊交換應該以非正式的方式進行，沒有太多正式的先決條件。
- C. 金融情報機構的合作應始終透過指定的中介機構進行。
- D. 正式的埃格蒙特集團會員資格要求確保符合資格的 FLU 的高度承諾。
- E. FLU 有權獨立簽署諒解備忘錄。

Answer: (SHOW ANSWER)

The principles of the Egmont Group of Financial Intelligence Units (FILLs) aimed at maximizing cooperation between FILLs to more effectively combat money laundering are [1]:

B: Information exchange should take place informally, without too many formal prerequisites. (CAMS Manual, 6th Edition, Page 55) E: It is within an FIU's authority to sign Memorandums of Understanding independently. (CAMS Manual, 6th Edition, Page 56)

NEW QUESTION: 404

對於打算開設銀行帳口的新企業客口，金融機構(FI)應該檢口哪些風險因素？（選擇三項）

- A. 企業客口所從事的業務類型。
- B. 新客口所有員工的就業概況和資訊。
- C. 新客口目前或之前曾辦理過銀行業務的所有金融機構。
- D. 高階管理官員和所有有權操作該帳口的個人的身分。
- E. 客口所在國家或開展業務的國家或地區。

Answer: (SHOW ANSWER)

When onboarding new corporate customers, financial institutions must conduct thorough due diligence (KYC

/CDD) to assess the risk profile of the business.

Option A (Correct): Knowing the customer's business activity is critical to identifying if it is a high-risk industry (e.g., cash-intensive businesses, virtual assets, shell companies).

Option D (Correct): Identifying senior management and account operators ensures that the rightful owners and controllers are known.

Option E (Correct): Jurisdictional risk is a key factor. If the company operates in a high-risk country, enhanced due diligence (EDD) may be required.

Option B (Incorrect): Employment profiles of all employees are not relevant unless the employees are politically exposed persons (PEPs) or linked to financial crime.

Option C (Incorrect): Knowing where a business previously banked is not standard practice unless the entity is flagged for suspicious activity.

AML Risks in Corporate Banking:

Shell Companies & Complex Ownership Structures: Can be used to hide beneficial owners and launder illicit funds.

High-Risk Countries & Sanctions Exposure: Customers linked to high-risk jurisdictions (FATF Grey/Blacklist) may require EDD measures.

Unusual Business Nature: Some businesses (e.g., cash-intensive industries, cryptocurrency firms) have higher financial crime risks.

Best Practices:

Conduct KYC/CDD at account opening and periodic reviews for risk management.

Use beneficial ownership registries to verify the ultimate beneficial owners (UBOs).

Cross-check against sanction lists (OFAC, UN, EU, etc.).

Reference:

FATF Recommendation 10 (Customer Due Diligence)

6th EU Anti-Money Laundering Directive (6AMLD)

Wolfsberg Group Guidance on Corporate Banking Risks

NEW QUESTION: 405

一家銀行收到了有關其一位客戶的傳票。銀行的金融情報部門 (FIU) 應審閱傳票並：

- A. 提交可疑活動報告 (SAR)，包括在 SAR 敘述中收到傳票的情況。
- B. 進行交易審閱並對傳票做出全面回應。
- C. 透過通知客戶傳票來關閉客戶的帳戶。
- D. 調整客戶的風險評分並結案。

Answer: (SHOW ANSWER)

Banks must comply with legal subpoenas while ensuring AML compliance.

Option B (Correct): The bank should review client transactions and respond fully to law enforcement.

Option A (Incorrect): Filing a SAR simply because of a subpoena is not required unless suspicious activity is identified.

Option C (Incorrect): Tipping off the client about the subpoena is illegal under AML laws.

Option D (Incorrect): Risk scores should be reviewed but not automatically adjusted solely based on a subpoena.

Reference: U.S. Bank Secrecy Act (BSA) Subpoena Compliance Rules, FATF Recommendation 40 (International Cooperation).

NEW QUESTION: 406

當銀行執行長向其直系親屬經營的慈善組織花費大量資金時，銀行執行長的助理應該採取什麼行動？

- A. 向銀行執行委員會報告行動。
- B. 與銀行執行長會面，了解捐款的原因。
- C. 調查慈善組織與銀行執行長的關係。
- D. 將問題匿名提交至銀行內部合規熱線。

Answer: (SHOW ANSWER)

Submitting the concern anonymously to the bank's internal Compliance Hotline is the most appropriate action that a bank CEO's assistant should take when the bank CEO expenses large sums of money to a charitable organization run by the bank CEO's direct family member. This is because this action would allow the assistant to report a potential case of fraud, conflict of interest, or misuse of funds without fear of retaliation or reprisal from the bank CEO. The Compliance Hotline is a confidential and

secure channel for employees to raise any concerns or suspicions about unethical or illegal activities within the bank. The Compliance Hotline would then forward the concern to the relevant authorities or departments for further investigation and action.

= The main references for this question are the following sources:

The document titled "Anti-Fraud Policy" published by the World Bank Group. You can access it by clicking here. This document states that "The World Bank Group has established a Compliance Hotline to receive reports of suspected fraud or corruption in World Bank Group-financed projects or activities, or in the World Bank Group's corporate procurement or administrative activities. The Compliance Hotline is available to all staff and external parties, such as contractors, consultants, beneficiaries of World Bank Group-financed projects, and the general public.

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NEW QUESTION: 407

與網上銀行相關的最重要的反洗錢問題是準確

- A. 捕獲數據
- B. 分析數據
- C. 識別客戶
- D. 生成報告

Answer: (SHOW ANSWER)

One of the main challenges of online banking is verifying the identity of customers who open accounts or conduct transactions remotely, without face-to-face interaction. This poses a higher risk of money laundering, as criminals may use false or stolen identities, or hide behind shell companies or nominees, to move illicit funds through online platforms. Therefore, online banking providers must implement robust and risk-based customer due diligence (CDD) measures, such as verifying identity documents, using biometric or digital verification methods, screening customers against sanctions and watchlists, and monitoring customer behavior and transactions for any red flags or anomalies.

ACAMS Study Guide for the CAMS Certification Examination, 6th Edition, Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Section 2.2:

Customer Due Diligence (CDD) and Know Your Customer (KYC), p. 32-35.

eWallets: AML Risks & How to Comply1

NEW QUESTION: 408

經濟制裁的最終目標是：

- A. 保護國家聲譽。
- B. 防止恐怖分子從貿易中獲利。
- C. 保護國家安全。
- D. 減少受制裁國家的利潤。

Answer: (SHOW ANSWER)

Economic sanctions are penalties imposed by one or more countries against another country, group, or individual for violating international norms or threatening national interests¹. The ultimate goal of economic sanctions is to protect national security by changing the behavior or policies of the target, or by weakening its capabilities or resources². Sanctions can be used to advance various foreign policy objectives, such as counterterrorism, nonproliferation, democracy promotion, human rights protection, conflict resolution, and cybersecurity¹. Sanctions can take different forms, such as travel bans, asset freezes, trade embargoes, arms restrictions, and aid reductions¹. Sanctions can be applied unilaterally by one country, or multilaterally by a coalition of countries or an international organization, such as the United Nations or the European Union¹.

1: What Are Economic Sanctions? | Council on Foreign Relations

2: How Economic Sanctions Work - Investopedia

Reference: <https://www.investopedia.com/articles/economics/10/economic-sanctions.asp>

NEW QUESTION: 409

金融行動特別工作小組 40 項報告可疑活動建議包含哪三項措施？（選擇三項）

- A. 應立即向該國的金融情報部門報告該活動。
- B. 執法部門已就該活動與金融機構簽訂合約。
- C. 金融機構有理由相信該活動與恐怖主義融資有關。
- D. 金融機構已聯絡帳戶持有人以確定帳戶的活動。
- E. 金融機構有合理的理由懷疑這些資金是犯罪活動的利益。

Answer: (SHOW ANSWER)

REPORTING OF SUSPICIOUS TRANSACTIONS [<https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf>] If a financial institution suspects or has reasonable grounds to suspect that funds are the proceeds of a criminal activity, or are related to terrorist financing, it should be required, by law, to report promptly its suspicions to the financial intelligence unit (FIU). According to the Financial Action Task Force's (FATF) Recommendation 20, a suspicious transaction report (STR) or a suspicious activity report (SAR) is filed by a financial institution or, by a concerned citizen, to the local Financial Intelligence Unit if they have reasonable grounds to believe that a transaction is related to criminal activity. [<https://aml-cft.net/library/suspicious-transaction-report-str-suspicious-activity-report-sar/>]

NEW QUESTION: 410

在某某離岸司法管轄區設立的信託是良好的資金存放工具，原因有哪些？

- A. 委託人和受益人的姓名已公開。

- B. 信託的設立通常是為了最大限度地減少口收。
- C. 離岸司法管轄區不熟悉信任。
- D. 信託可能持有大量資口。

Answer: (SHOW ANSWER)

it describes a reason why trusts established in certain offshore jurisdictions make good vehicles to layer money, which is names of the settlor and beneficiaries are not publicly available. This means that the true owners and controllers of the funds or assets held by the trust are hidden from the public and the authorities, and can only be accessed by the trustee or the protector, who may be complicit or unaware of the money laundering scheme. This creates a high level of anonymity and secrecy for the money launderers, who can use the trust to move, disguise, or conceal the origin and destination of their illicit funds.

The other options are not necessarily reasons why trusts established in certain offshore jurisdictions make good vehicles to layer money, although they may have some advantages or disadvantages depending on the circumstances and the risk profile of the customers and countries involved. Option B describes a possible motive for setting up a trust in an offshore jurisdiction, which is to minimize taxes, but this does not imply that the trust is used to layer money, as there may be legitimate tax planning or optimization purposes. Option C describes a possible challenge or obstacle for setting up a trust in an offshore jurisdiction, which is offshore jurisdictions are unfamiliar with trust, but this does not imply that the trust is used to layer money, as there may be other legal or financial vehicles available in those jurisdictions. Option D describes a possible characteristic or feature of a trust, which is trusts may hold assets of significant size, but this does not imply that the trust is used to layer money, as there may be valid reasons or sources for the large assets.

ACAMS CAMS Certification Video Training Course - 6th Edition¹

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition)² ACAMS CAMS Study Guide - 6th Edition, Chapter 4, pages 86-87

<https://www.acams.org/wp-content/uploads/2019/09/ACAMS-CAMS-Study-Guide-6th-Edition-Chapter-4.pdf>

NEW QUESTION: 411

行銷部門向反洗錢專家提交了一份針對擔任重要公共職位的個人的商業計劃。除了從這些客口那裡獲取正確的身份證明和基本資訊外，反洗錢專家還應該建議金融機構做什麼來檢口客口的背景並根據公開資訊加強盡職調口？

1. 確定客口是否出現在巴塞爾銀行監理委員會的公職人員名單上。
 2. 調口資金來源。
 3. 辨識明顯相關的人員和公司。
 4. 充分辨識一個人的身份，包括他們的政治史。
- A. 僅限 1、2 和 3
 - B. 限 1、2 和 4
 - C. 僅限 1、3 和 4
 - D. 僅限 2、3 和 4

Answer: (SHOW ANSWER)

The anti-money laundering specialist should recommend a financial institution to investigate the source of funds, identify people and companies that are clearly related, and identify a person fully, including their political history, when dealing with individuals holding important public positions. These are essential steps to conduct enhanced due diligence based on public information, as they can help to assess the risk profile, the legitimacy, and the transparency of the customer relationship. The Basel Committee on Banking Supervision's list of public officials is not a reliable source of public information, as it is not comprehensive, updated, or verified. Therefore, it is not a sufficient criterion to check the background of potential customers.

ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 4, page 971

ACAMS CAMS Certification Video Training Course, Module 4, Lesson 32

ACAMS CAMS Certification Exam Outline, Domain 4, Task 23

NEW QUESTION: 412

一位居住在 A 國（歐盟高風險第三國司法管轄區名單上）的富人的代理人，聯繫了歐盟國的一位公證人。代理人希望透過離岸公司完成對富人最近在拍賣會上獲得的資口的處置。代理人亦持有由 C 國（也是歐盟國家）一家知名律師事務所所開立的代表離岸公司行事的授權書。代理人要求公證人盡快進行處置，而無需特別關注此交易的相關費用或口金。公證人注意到預期的轉讓價格明顯低於拍賣會上記錄的價格，但代理人不願討論此事，並聲稱這不在授權書的範圍內。

公證員應考慮哪些危險訊號？（選兩個）

- A. 代理商要求以低於最近收購的價格處置資口。
- B. 透過拍賣獲得的資口被放在一家離岸公司的名下
- C. 代理人代表居住在歐盟高風險管轄區名單上的國家/地區的個人行事
- D. 該授權書是由交易發生地點以外的歐盟國家的律師事務所簽發的。

Answer: (SHOW ANSWER)

* A: Selling assets at a significant loss, especially shortly after purchase, is a classic red flag for asset laundering and value manipulation, which can be used to disguise the true nature of proceeds.

* C: Transactions involving individuals from high-risk jurisdictions, as identified by the EU and FATF, warrant heightened scrutiny due to increased ML/TF risk. (CAMS 6th Edition, Red Flags for Complex Asset Transactions; EU List of High-Risk Third Countries)

* B and D may contribute to complexity but are not the primary red flags in this scenario.

References:

CAMS 6th Edition, Red Flags in Notarial and Legal Transactions

EU AML Directives and High-Risk Country Lists

NEW QUESTION: 413

聯合國制定制裁制度的主要目標包括：（選擇三項）

- A. 迫使發展中國家實行自由民主或實質民主。
- B. 支持政府和政權和平解決衝突。
- C. 懲罰對金融犯罪控制不力的政府。

D. 阻止國家口部的非民主與非憲法變革。

E. 支持保護人權。

Answer: (SHOW ANSWER)

UN sanctions regimes are not punitive but aim to:

* B: "Support peaceful resolution of conflicts."

* D: "Deter non-democratic and unconstitutional changes of government."

* E: "Promote respect for human rights and humanitarian law."(CAMS 6th Edition, United Nations Sanctions; UN Security Council Mandates) Incorrect:

* A: The UN does not impose sanctions to force regime type.

* C: Sanctions are not for punishing weak AML controls.

References:

CAMS 6th Edition, UN Sanctions

UN Security Council, Sanctions Objectives

NEW QUESTION: 414

一名執法官員致電銀行，詢問目前正在接受調口的一名客口的情況。執法官員要求提供有關客口的資訊。銀行該如何因應？

A. 確認客口是目前客口還是以前的客口

B. 在回應請求之前通知董事會

C. 提供所需的資訊以協助調口

D. 請求提交正式信件以驗證請求的有效性

Answer: (SHOW ANSWER)

The bank should request a formal letter be submitted to verify the validity of the request, as this is the best practice to ensure compliance with the law and protect customer privacy. The bank should not confirm or deny the existence of a customer relationship, nor provide any information without proper authorization. The bank should also not inform the board of directors before responding to the request, as this could compromise the confidentiality of the investigation or alert the customer.

ACAMS CAMS Certification Video Training Course, Module 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Section 2.3: Data Protection and Privacy, Slide 10 ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 2: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Page 51
Reference:<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/receiving-a-request/>

NEW QUESTION: 415

一家私人銀行的合規官的任務是製定一份關於銀行如何與中介機構打交道的政策。

有關中介機構的政策應包括哪兩個方面，以使其符合《沃爾夫斯堡私人銀行反洗錢原則》？（選兩個）

A. 當中介機構向銀行介紹客口時，銀行無需對中介機構的客口進行盡職調口。

B. 如果中介機構向銀行介紹客口，則銀行必須獲取有關被介紹客口的相同類型的信息，否則銀行將在沒有中介機構參與的情況下獲取該信息。

C. 如果中介機構代表多個客戶管理資產並且是銀行帳戶持有人，但該中介機構未進行與銀行相同水平的盡職調查，則銀行有必要對中介機構的客戶進行盡職調查。

D. 如果中介機構代表多個客戶管理資產並安排其客戶在銀行開設帳戶，並且該中介機構是受類似法規約束的金融機構，則銀行有必要對中介機構的客戶進行盡職調查。

Answer: (SHOW ANSWER)

According to the Wolfsberg Anti-Money Laundering Principles for Private Banking (2012), the bank should have a clear policy on how to deal with intermediaries, such as lawyers, accountants, trust and company service providers, or other financial institutions, that introduce or manage clients on behalf of the bank. The policy should reflect the following aspects¹:

- * The bank should perform due diligence on the intermediary itself, including its ownership, reputation, regulatory status, and AML policies and procedures.
- * The bank should obtain the identity and beneficial ownership information of the clients introduced or managed by the intermediary, and verify them using reliable and independent sources, unless there are legal or regulatory impediments to do so.
- * The bank should assess the level of due diligence performed by the intermediary on its clients, and determine whether it is equivalent or comparable to the bank's own standards. If not, the bank should perform additional due diligence on the intermediary's clients, or decline to accept them.
- * The bank should monitor the transactions and activities of the clients introduced or managed by the intermediary, and report any suspicious or unusual activity to the relevant authorities.

Option B is consistent with these aspects, as it states that the bank must obtain the same type of information with respect to an introduced client that would otherwise be obtained by the bank, absent the involvement of the intermediary. This ensures that the bank has a sufficient understanding of the client's identity, source of wealth, and risk profile, and can apply appropriate AML measures.

Option C is also consistent with these aspects, as it states that where an intermediary manages assets on behalf of a number of clients and is the account holder with the bank, but that intermediary does not conduct the same level of due diligence as the bank, it is necessary for the bank to undertake due diligence on the intermediary's clients. This ensures that the bank does not rely solely on the intermediary's due diligence, and can identify and mitigate any potential money laundering risks associated with the clients.

Option A is not consistent with these aspects, as it states that when an intermediary introduces clients to the bank, it is not necessary for the bank to perform due diligence on the intermediary's clients. This contradicts the principle that the bank should obtain and verify the identity and beneficial ownership information of the clients introduced by the intermediary, unless there are legal or regulatory impediments to do so.

Option D is also not consistent with these aspects, as it states that where an intermediary manages assets on behalf of a number of clients and arranges for the opening of accounts for its clients with the bank, and that intermediary is a financial institution subject to similar regulations, it is necessary for the bank to perform due diligence on the intermediary's clients. This contradicts the principle that the bank may rely on the due diligence performed by the intermediary on its clients, if the intermediary is a regulated financial institution that applies equivalent or comparable AML standards to the bank, and if the bank has access to the relevant information and documentation.

NEW QUESTION: 416

洗錢者可以在存款機構使用什麼安置方法？

- A. 將現金存入洗錢者的帳戶
- B. 在帳戶之間發送大量資金轉賬
- C. 從洗錢者帳戶提取大量現金
- D. 將銀行本票和匯票存入洗錢者的帳戶

Answer: (SHOW ANSWER)

According to the ACAMS CAMS Study Guide, one of the most common methods of placement is to deposit cash into a bank account, either directly or through intermediaries. This allows the money launderer to introduce the illicit funds into the legitimate financial system, and to create a paper trail that can be used to justify the source of the funds. However, this method also exposes the money launderer to the risk of detection by the bank's anti-money laundering (AML) policies and procedures, such as customer identification, transaction monitoring, and reporting of suspicious activities¹.

ACAMS CAMS Study Guide, 6th Edition, page 271

Reference: <https://www.investopedia.com/terms/m/moneylaundering.asp>

NEW QUESTION: 417

居住在高風險司法管轄區的客戶經常在銀行存入大量現金。同一客戶向其他高風險司法管轄區的無關方發送小額電匯。

可能表示洗錢的兩個危險訊號是什麼？（選兩個）

- A. 銀行允許現金存款
- B. 客戶位於高風險司法管轄區
- C. 電匯至高風險管轄區
- D. 大額現金存款來自高風險司法管轄區

Answer: (SHOW ANSWER)

Wire transfers to high-risk jurisdictions and large cash deposits from a high-risk jurisdiction are two red flags that may indicate money laundering. These activities suggest that the customer is trying to move funds from or to a country that has weak anti-money laundering (AML) controls, or that is known to be a source or destination of illicit funds¹². Wire transfers can also be used to obscure the origin or destination of the funds, or to layer transactions through multiple accounts or intermediaries³. Large cash deposits can indicate that the customer is trying to avoid the reporting or record-keeping requirements that apply to cash transactions, or that the customer is dealing with proceeds from illegal activities⁴⁵. The other two options are not necessarily red flags, as the bank may have legitimate reasons to allow cash deposits, and the client may reside in a high-risk jurisdiction for legitimate reasons.

1: FFIEC BSA/AML Examination Manual, Appendix F: Money Laundering and Terrorist Financing Red Flags, Geographic Concerns, 6; 2: AML Red Flags - What are the Top 10 Indicators?, ComplyAdvantage, 5; 3: FFIEC BSA/AML Examination Manual, Appendix F: Money Laundering and Terrorist Financing Red Flags, Transaction Has Unusual Features, 6; 4: FFIEC BSA/AML Examination

Manual, Appendix F: Money Laundering and Terrorist Financing Red Flags, Unusual Source of Funds, 6; 5:

Money Laundering Red Flags | Key Behaviours and Indicators, High Speed Training, 8.

Reference: <https://aml-cft.net/library/banks-amlcft-red-flags/>

NEW QUESTION: 418

外國資口管制辦公室 (OFAC) 負責 :

- A. 確保有效的出口管制和條約遵守制度
- B. 實施和執行經濟和貿易制裁
- C. 指定管轄區為主要洗錢關注點
- D. 管理美國與外國之間的貿易協定

Answer: (SHOW ANSWER)

The Office of Foreign Assets Control (OFAC), part of the U.S. Department of the Treasury, is responsible for the administration and enforcement of economic and trade sanctions. These sanctions are based on U.S.

foreign policy and national security objectives and target:

Foreign countries and regimes

Terrorist organizations

Narcotics traffickers

Individuals and entities engaged in activities related to the proliferation of weapons of mass destruction
OFAC acts under various authorities, including national emergency powers granted by the President and specific legislation. One of its primary tools is the Specially Designated Nationals (SDN) List, which identifies individuals and entities whose assets are blocked and with whom U.S. persons are generally prohibited from dealing.

It is important to note that OFAC is not responsible for designating jurisdictions as primary money laundering concerns (a task handled by FinCEN under Section 311 of the USA PATRIOT Act), nor does it manage trade agreements.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: U.S. Regulatory Framework - Section: Office of Foreign Assets Control (OFAC)

NEW QUESTION: 419

下列哪一項通常是不遵守反洗錢法的間接後果？

- A. 股票價口下跌
- B. 懲罰性罰款
- C. 刑事訴訟
- D. 制裁

Answer: (SHOW ANSWER)

Non-compliance with anti-money laundering (AML) laws and regulations can lead to severe consequences for both financial institutions and individuals. One of the indirect consequences is the imposition of punitive fines. These fines can vary based on the type of violation and the institution's willingness to address the issue.

Additionally, non-compliance may damage a company's reputation, impacting its standing in the market and potentially leading to financial losses beyond the fines themselves¹²³.

References:

Consequences of AML Non-Compliance

Understanding, Consequences & Changes in Anti-Money Laundering

Mastering Compliance: Effective AML Controls for Non-Bank Financial Institutions AML Compliance: The Risks of Poor Practice and What Not to Miss

NEW QUESTION: 420

某國家的金融情報機構 (FIU) 收到了一份可疑活動報告 (SAR)，其中涉及大量可疑資金轉移，包括國內和國際資金轉移。金融情報機構需要來自外國的更多信息，以確定是否需要將此事提交當地起訴。在這種情況下，下列哪一項敘述是正確的？

- A. 國家主權表示資訊不能被外國取得。
- B. 取得來自外國的資訊違反了國際資料保護法。
- C. 任何與洗錢有關的資訊都可能隨時從任何組織收到，無論其管轄範圍如何。
- D. 艾格蒙特集團成員國可以互相要求資訊援助。

Answer: (SHOW ANSWER)

Cross-border AML investigations require cooperation through official channels, such as the Egmont Group.

Option D (Correct): The Egmont Group is an international network of FIUs that facilitates secure information exchange in financial crime investigations.

Option A (Incorrect): While sovereignty applies, formal international cooperation mechanisms exist.

Option B (Incorrect): AML cooperation is allowed under legal frameworks (e.g., MLATs, Egmont Secure Web).

Option C (Incorrect): Information-sharing is restricted to authorized government agencies, not all organizations.

Reference: Egmont Group of FIUs, FATF Recommendation 40 (International Cooperation), Mutual Legal Assistance Treaties (MLATs).

NEW QUESTION: 421

對反洗錢培訓文件的口部審閱顯示，只有銷售人壽保險口品的金融機構僱用的新代理人接受了培訓。此外，通常需要機構

8個月開始新精算師培訓。合規官員解釋說，培訓僅限於精算師，因為他們執行唯一的高風險職能。該機構依賴電子學習技術，沒有後續評估。

口部審閱最有可能建議解決下列哪些問題？

- A. 除董事會外，所有員工都必須接受培訓。
- B. 應在全公司範圍內提供針對口品的反洗錢培訓。
- C. 機構必須在 6 個月內向精算師提供反洗錢訓練。
- D. 在訓練期間繼續使用電子學習來強調反洗錢內容。

Answer: (SHOW ANSWER)

The internal review would most likely recommend that the institution provide product-specific anti-money laundering training to all relevant employees, not just actuaries. This is because life insurance products can be used for money laundering purposes, such as purchasing policies with illicit funds, surrendering policies for cash value, or using policies as collateral for loans. Therefore, all employees who are involved in selling, servicing, or processing life insurance products should be aware of the money laundering risks and red flags associated with these products, and how to report any suspicious activity. The institution should also ensure that the training is timely, effective, and tailored to the specific roles and responsibilities of the employees.

The other options are not as relevant or appropriate as the correct answer. Option A is too broad, as not all staff need to be trained on anti-money laundering, only those who are relevant to the institution's business activities and exposure to money laundering risks. Option C is too narrow, as it only focuses on actuaries and does not address the need for training other employees who may deal with life insurance products. Option D is not sufficient, as e-learning alone may not be effective in ensuring that employees understand and retain the anti-money laundering content, and the institution should also conduct follow-up assessments to measure the impact and outcomes of the training.

ACAMS Study Guide for the CAMS Certification Examination - 6th Edition, Chapter 3: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), page 57.

ACAMS CAMS Certification Video Training Course, Module 3: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Lesson 3.5: Training and Testing. Best Practices for Anti-Money Laundering Compliance - DIRO Original, Section 3: Adequate Training.

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NEW QUESTION: 422

沃爾夫斯堡集團私人銀行反洗錢原則：

- A. 要求銀行更好地管理聲譽風險並保護富裕客戶的隱私。
- B. 協助在資料隱私標準較高的司法管轄區開展業務的金融機構與易受洗錢影響的行業合作。
- C. 建議銀行只接受那些資金來源和實際所有權已知的客戶。
- D. 為私人銀行家制定如何與政治公眾人物 (PEP) 和居住在高風險國家的人員打交道的規則

Answer: D (LEAVE A REPLY)

NEW QUESTION: 423

埃格蒙特集團的主要目標是什麼？

- A. 透過評估系統驗證金融行動特別工作小組在國家和地區的實施情況
- B. 根據諒解備忘錄向國家執法機構提供執法建議
- C. 監理機關透過全體會議交換國際法解釋
- D. 透過科技應用促進金融情報部門之間更好、更安全的通信

Answer: (SHOW ANSWER)

The Egmont Group is a united body of 174 Financial Intelligence Units (FIUs) that uniquely support national and international efforts to counter terrorist financing and share financial information per global anti-money laundering and counter-financing of terrorism (AML/CFT) standards. Its primary objective is to enhance international cooperation in the investigation and prosecution of money laundering and financing of terrorism.

The Egmont Group facilitates the exchange of expertise and financial intelligence among FIUs to combat money laundering, terrorist financing, and associated predicate offenses. While it does not conduct financial investigations itself, it plays a crucial role in improving stakeholders' understanding of ML/TF risks and informing policy considerations related to AML/CFT implementation and reforms¹².

References: 1: About - Egmont Group 2: Decoding Global AML: The Role Of The Egmont Group - Financial Crime Academy

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