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Exam : **CAMS-CN**

Title : Certified Anti-Money
Laundering Specialists
(CAMS中文版)

Vendor : ACAMS

Version : DEMO

QUESTION NO: 1

哪一種私人銀行業務狀況需要根據沃爾夫斯堡集團的反洗錢原則實施盡職調查行動？

- A. 一位當地富人想要成為當地零售銀行的客戶。
- B. 交易所的受益所有人想要在銀行開設帳戶。
- C. 來自高風險國家的富人想要在私人銀行開設帳戶。
- D. 新客戶要求以銀行為代理行設立兌換所。

Answer: C

this situation requires enhanced due diligence actions according to the AML principles of the Wolfsberg group. The Wolfsberg group is an association of 13 global banks that aims to develop standards and best practices for AML and CFT in the private banking sector. The group has issued a set of principles and guidance on how to conduct due diligence on private banking customers, especially those who pose higher risks, such as politically exposed persons (PEPs), customers from high-risk countries, and customers with complex or opaque structures. According to the Wolfsberg group, private banks should apply a risk-based approach to customer due diligence and perform enhanced measures for high-risk customers, such as obtaining senior management approval, verifying the identity and source of wealth of the customer and the beneficial owner, understanding the purpose and nature of the relationship, and conducting ongoing monitoring and review.

ACAMS Study Guide 6th Edition, Chapter 4, Section 4.5, page 118: "The Wolfsberg Group". ExamTopics, Question 466: "Which private banking situation requires due diligence actions to be implemented according to the AML principles of the Wolfsberg group?"

QUESTION NO: 2

聯合國制定制裁制度的主要目標包括：（選擇三項）

- A. 支持政府和政權和平解決衝突。
- B. 阻止國家內部的非民主和非憲法變革。
- C. 迫使發展中國家採取自由民主或實質民主。
- D. 懲罰對金融犯罪控制不力的政府。
- E. 支持保護人權。

Answer: A,B,E

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

QUESTION NO: 3

一位潛在客戶致電經紀商，希望購買證券。該客戶似乎並不關心帳戶費用或證券價格。潛在客戶提供的進一步資訊表明，該客戶可能有親屬在其希望投資的公司工作。這位潛在客戶試圖從

事哪種類型的活動？

- A. 轉帳至第三人帳
- B. 用作存款帳戶
- C. 轉移價值
- D. 內線消息的使用

Answer: D

The potential client is attempting to commit the illegal activity of using insider information to trade securities.

Insider information is any material, non-public information that could affect the price or value of a security, such as earnings reports, mergers, acquisitions, or regulatory actions. Insider trading is the act of buying or selling securities based on insider information, which gives the trader an unfair advantage over other investors who do not have access to such information. Insider trading violates the principles of market integrity, fairness, and transparency, and can undermine investor confidence and trust. Insider trading is also a form of market abuse and financial crime, and is subject to civil and criminal penalties.

ACAMS Study Guide for the CAMS Certification Examination - 6th Edition, Chapter 1: Risks and Methods of Money Laundering and Terrorism Financing, Section 1.3: Financial Crime, Subsection 1.3.3: Market Abuse, pp. 25-26 ACAMS CAMS Certification Video Training Course, Module 1: Risks and Methods of Money Laundering and Terrorism Financing, Lesson 1.3: Financial Crime, Sublesson 1.3.3: Market Abuse, Video Time: 2:00-3:30

Exam CAMS: Certified Anti-Money Laundering Specialist (the 6th edition), Question 12, Answer C

QUESTION NO: 4

濫用信託和資產管理服務會帶來哪些洗錢風險？（選三項）

- A. 隱瞞資金來源
- B. 允許第三人保管資金
- C. 為交易增加一層匿名性
- D. 隱瞞真正的合法及實際受益所有人
- E. 為房地產交易建立託管帳戶

Answer: A,C,D

* A, C, D:

* "Trust and asset management services can facilitate the concealment of the source of funds (A), provide a layer of anonymity to transactions (C), and obscure the true legal and beneficial owners (D). These are well-established ML/TF risks in the private wealth sector."(CAMS 6th Edition, ML/TF Risks in Trust and Asset Management)

* B and E are normal aspects of asset management and are not in themselves ML/TF risks unless combined with other suspicious behaviors.

References:

CAMS 6th Edition, Risks in Trust and Asset Management
FATF Recommendations 24, 25

QUESTION NO: 5

哪些構成與涉及非法採伐的公司有關的危險訊號？（選三。）

- A. 企業註冊活動顯示促進環境保護
- B. 透過公司關聯的銀行帳戶進行大量交易
- C. 紙包裝需求生產
- D. 將木材快速運送到遙遠的司法管轄區
- E. 在非保護區使用重型機械
- F. 行政人員與政治人物的聯繫

Answer: D,E,F

Red flags in connection with a company involved in illegal logging include: D. Expeditious shipment of wood to far away jurisdictions, E. Use of heavy machinery in non-protected areas, and F. Executive's association with politically exposed persons. These red flags could be indicative of attempts to conceal the origin of illegally harvested wood and to avoid detection by government authorities.

QUESTION NO: 6

下列哪些法律或法規會影響反洗錢/反恐怖主義融資計畫的應用，並要求金融機構（「F」）平衡多項合規要求？

A.

在處理客戶投訴或糾紛時，消費者保護法可能會與反洗錢/反恐怖主義融資要求交叉，這可能會影響金融機構如何實施其合規計劃。

B.

反洗錢/反恐怖主義融資法是金融機構關注的重點，資料隱私和消費者保護等其他法規可能只會間接影響其合規義務

C. 環境、社會和治理 (ESG) 框架可以影響 FI

的風險管理策略，但通常被認為與核心反洗錢/反恐怖主義融資合規要求無關

D.

資料隱私法可以限制客戶資訊的共享，而金融包容性措施要求金融機構避免過度降低風險，因為這可能會將弱勢群體排除在外。

Answer: D

QUESTION NO: 7

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稅款。

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: A

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.

QUESTION NO: 8

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% 股份的自然入
- 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查

Answer: C

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)

QUESTION NO: 9

關於網路銀行為金融機構帶來重大洗錢風險的說法，哪三項是正確的？

- A. 網路銀行的性質可能導致很難確定誰在控制帳戶
- B. 透過網路輕鬆存取可實現資金跨境流動
- C. 出於客戶機密性，線上收集的資訊不能僅因懷疑而與執法機構共享
- D. 電子交易的速度使得能夠在短時間內執行多個複雜的交易

Answer: A,B,D

On-line banking offers a significant money laundering risk to a financial institution because: The nature of on-line banking can make it difficult to establish who is controlling the account. On-line banking allows customers to access their accounts remotely, without face-to-face contact with the financial institution. This can pose challenges for verifying the identity and legitimacy of the account holder, especially if the account is opened on-line or through a third-party intermediary. On-line banking can also facilitate the use of anonymous or fictitious identities, or the use of proxies or nominees to hide the true beneficial owner of the account. The ease of access through the internet enables cross border movement of funds. On-line banking allows customers to transfer funds quickly and easily across different jurisdictions, without physical movement of cash or other instruments. This can increase the risk of money laundering, as funds can be moved to or from high-risk countries or regions, or through multiple accounts or financial institutions, to obscure the origin, destination, or purpose of the funds. On-line banking can also enable customers to access or use alternative payment systems or virtual currencies, which may have lower regulatory oversight or transparency standards than traditional banking systems.

The speed of electronic transaction enables execution of multiple complex transactions within

short time frame. On-line banking allows customers to conduct transactions in real time, with minimal or no human intervention or verification. This can increase the risk of money laundering, as customers can execute multiple transactions in a short period of time, or use complex transaction structures or patterns, to avoid detection or reporting thresholds, or to conceal the source, nature, or ownership of the funds. On-line banking can also enable customers to use automated or algorithmic trading systems, which may generate large volumes of transactions that are difficult to monitor or analyze.

CAMS Study Guide - 6th Edition, Chapter 5, pages 139-140

CAMS Certification Exam Outline, Domain 2, Task 2.1, Skill 2.1.1

Online Banking and Money Laundering, ACAMS Today, September 2012

QUESTION NO: 10

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. 執行當地反洗錢法規
- C. 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
- D. 制定標準來評估成員是否有適當的反洗錢制度

Answer: C

QUESTION NO: 11

非美國銀行詢問其美國代理行，如果客戶涉及上游犯罪，其代理行帳戶中的資金是否有被扣押的風險。代理行的答覆應該是：

- A. “不可以，主管機關只能扣押和沒收美國公民的美國帳戶。”
- B. “不可以，只有美國銀行的代理帳戶可以被政府機構扣押和沒收。”
- C. “是，如果懷疑洗錢活動僅發生在美國”
- D. “是的，如果客戶的帳戶被涉嫌洗錢的人在美國以外的國家/地區使用，也是如此。”

Answer: D

The bank's current anti-money laundering program is inadequate because it does not include a process for monitoring customer account activity, which is a key component of detecting and reporting suspicious transactions. The fact that the consultant and the bank have mutual clients does not affect the risk rating of those customers, nor does it justify a lower level of scrutiny. The bank should revise its procedures to ensure that it has a comprehensive and risk-based approach to customer due diligence, transaction monitoring, and reporting.

CAMS Certification Package - 6th Edition, Chapter 3: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), pp. 67-69.

FATF Guidance for a Risk-Based Approach: Legal Professionals, pp. 10-11, 19-20.

BSA/AML Internal Audit: PwC, pp. 1-2.

QUESTION NO: 12

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: C,D

QUESTION NO: 13

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；確定沒有第三方能夠存取該帳戶；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: C

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

QUESTION NO: 14

一家銀行為一位知名律師開設了一個新帳戶來管理客戶資金。在前六個月，銀行人員觀察到該帳戶透過電匯收到多筆存款。他們還觀察到，律師提取現金，向不同的人付款，並將資金轉入律師事務所的線上帳戶。

在這種情況下，什麼被視為潛在洗錢的危險信號？

- A. 提領現金
B. 向不同的人付款
C. 透過電匯接收多筆存款
D. 將資金線上轉入其律師事務所帳戶

Answer: B

According to the ACAMS CAMS Study Guide, one of the methods that attorneys may use to facilitate money laundering is to make payments to third parties on behalf of their clients, using funds from their client accounts. This may obscure the source and destination of the funds, and create a false appearance of legitimate transactions. Therefore, making payment to various people is a red flag for potential money laundering in this situation.

ACAMS CAMS Study Guide, 6th Edition, page 117

FATF Report on Money Laundering and Terrorist Financing Vulnerabilities of Legal Professionals, June

2013, page 341

AML/CFT Red Flags for Lawyers, AML-CFT.net, October 20202

QUESTION NO: 15

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: B,D

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 19781. 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

QUESTION NO: 16

監管檢查報告的調查結果表明，合規部門以外人員的工作描述中未提及反洗錢職責。

公司應該採取什麼行動？

- A. 更新所有職位說明以包含反洗錢職責
- B. 回應只有合規人員才有反洗錢職責
- C. 向所有員工發送電子郵件，說明員工必須遵守反洗錢政策
- D. 回覆年度訓練包含反洗錢責任說明

Answer: A

According to the ACAMS Study Guide, one of the essential elements of an effective anti-money laundering (AML) program is to assign clear roles and responsibilities to all staff members, regardless of their position or department¹. This ensures that everyone is aware of their obligations and expectations in relation to AML compliance, and that they receive appropriate training and guidance. Therefore, the firm should update all job descriptions to include references to AML responsibilities, such as identifying and reporting suspicious activity, conducting customer due diligence, and adhering to AML policies and procedures. The other options are not sufficient or correct, because:

B). Responding that only compliance personnel have AML responsibilities is incorrect, because AML compliance is not only the responsibility of the compliance department, but of the entire organization¹. All staff members should be involved in the AML program and contribute to its effectiveness.

C). Sending an email to all staff stating that personnel must observe the AML policy is not sufficient, because it does not specify what the AML policy entails, or how it applies to different roles and functions. An email is also not a permanent or formal way of communicating AML responsibilities, and it may not reach all staff members or be taken seriously.

D). Replying that a description of AML responsibilities is included in the annual training is not sufficient, because it does not address the issue of the job descriptions, which should reflect the AML responsibilities of each position. Moreover, annual training may not be frequent or comprehensive enough to cover all aspects of AML compliance, and it may not be tailored to the specific needs and risks of each role or department.

References:

1: ACAMS Study Guide, 6th Edition, Chapter 2: Developing an Effective Anti-Money Laundering Program, page 49.

QUESTION NO: 17

金融行動特別工作小組式區域機構 (FSRB) 的角色是； (選擇三個。)

- A. 透過發布源自 FSRB 管轄範圍之外的成員的類型來識別和解決當前的金融犯罪趨勢。
- B. 向 FSRB 轄區內的成員提供所需的 AM L/C FT 技術援助。
- C. 協調 FSRB 管轄範圍內成員的技術援助
- D. 為其 FSRB 管轄範圍內的成員制定和修改 FATF 40 項建議。
- E. 識別並解決 FSRB 管轄範圍之外的成員的反洗錢/反恐怖主義融資政策中的任何漏洞。
- F. 為 FSRB 管轄範圍內的成員提供相互評估和跟進流程。

Answer: B,C,F

QUESTION NO: 18

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. 報告期間內提交的 SAR 統計數據
- D. 報告期間內提交的所有 SAR 的副本

Answer: C

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".

QUESTION NO: 19

一家銀行多年來一直為歐洲慈善機構開設帳戶。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戶，用於支付非業務相關費用

Answer: A

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-](https://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Terrorist%20Financing%20Typologies%20Report.pdf)

[gafi.org/media/fatf/documents/reports/FATF%20Terrorist%20Financing%20Typologies%20Report.pdf](https://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Terrorist%20Financing%20Typologies%20Report.pdf)

QUESTION NO: 20

所有反洗錢計畫通常都需要哪些要素？

- A. 以電腦為基礎的可疑活動監控系統
- B. 負責管理此計劃的合格合規官
- C. 為所有員工提供年度現場反洗錢培訓
- D. 針對所有新客戶的強化盡職調查計劃

Answer: B

a qualified compliance officer is a mandatory element of all anti-money laundering programs, regardless of the type or size of the financial institution. The compliance officer is responsible for developing, implementing, and overseeing the anti-money laundering program, ensuring its compliance with the relevant laws and regulations, and reporting any suspicious activity to the appropriate authorities¹². The compliance officer should have sufficient authority, resources, and expertise to perform these duties effectively.

Anti-Money Laundering (AML) | FINRA.org¹

Anti-Money Laundering Program and Suspicious Activity Reporting Requirements For Insurance Companies Frequently Asked Questions | FinCEN.gov²

QUESTION NO: 21

當機構針對特定帳戶提交 STR 時，該機構應採取哪些步驟來處理 Visa 帳戶？

- A. 由於該帳戶有明顯風險，機構應關閉該帳戶
- B. 由於需要繼續監控帳戶，機構應保持帳戶開放
- C. 機構應諮詢其律師和反洗錢合規官，並確定關閉帳戶是否符合機構的程序
- D. 機構不應因存在向客戶通風報信並擾亂刑事調查的風險而關閉帳戶

Answer: C

According to the ACAMS Study Guide, 6th Edition, page 184, "The decision to close an account should be made in consultation with the institution's legal counsel and AML compliance officer, and in accordance with the institution's policies and procedures." Closing an account may not always be the best option, as it may trigger the customer's suspicion, interfere with law enforcement investigations, or expose the institution to legal risks. Therefore, the institution should carefully weigh the pros and cons of closing an account, and follow its own internal guidelines.

ACAMS Study Guide, 6th Edition, page 184

What steps should the institution take? - Exam4Training

Suspicious Transaction Report (STR) / Suspicious Activity Report (SAR) | AML-CFT

QUESTION NO: 22

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: A,D

* 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

QUESTION NO: 23

除了監控可疑活動之外，電子監控系統還有什麼價值？

- A. 辨識客戶如何使用產品
- 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: D

"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.

QUESTION NO: 24

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: C

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

QUESTION NO: 25

外國司法管轄區的執法機構 (LEA) 就金融機構 (FI) 的一位客戶聯繫該機構。LEA 表示，由於一系列人口販賣指控，該客戶目前正在被通緝。佛羅裡達州該做什麼？（選兩個。）

- A. 檢查客戶端的活動，確定是否有可疑活動，並相應地報告。
- B. 告知 LEA 需要聯絡政府進行引渡。
- C. 立即遵守外國司法管轄區的規定並移交所有客戶資訊。
- D. 將意識請求告知當地 LEA 和監管機構。
- E. 立即關閉客戶帳戶以避免任何不當風險。

Answer: A,D

According to the Certified Anti-Money Laundering Specialist (the 6th edition), the financial institution (FI) should take the following actions:

- A). Review the client's activity, determine if suspicious activity exists, and report accordingly. The FI should assess the risk of the situation and determine if there is any suspicious activity that needs to be reported to the appropriate authorities. This would involve conducting a review of the client's account activity and transactions to determine if there are any indicators of money laundering or terrorist financing.
- D). Inform local LEA and regulator of the request for awareness. The FI should inform the local law enforcement agency and regulator of the request from the foreign jurisdiction to raise awareness of the situation and determine if any further actions need to be taken.

QUESTION NO: 26

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查和可能的修訂。

合規官應該先執行哪一步？

- A. 審查機構的風險評估
- 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: A

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/CF T program begins with the Risk Based Approach. It should first check the internal system to identify risk factors and design program accordingly.

QUESTION NO: 27

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: A

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.

QUESTION NO: 28

大量傳入電匯會產生有關客戶的警報。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

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

QUESTION NO: 29

在評估了國際標準的最新變化後，反洗錢專家應考慮對以下機構持有的帳戶加強盡職調查：

1. 律師。
2. 外匯交易商。
3. 零售帳戶持有人。
4. 貴金屬經銷商。

- 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: B

Enhanced due diligence (EDD) is a higher level of customer due diligence that is required for customers or accounts that pose a higher risk of money laundering or terrorist financing.

According to the FATF Recommendations, EDD measures may include obtaining additional information on the customer, the beneficial owner, the intended nature and purpose of the business relationship, the source and destination of funds, and the reasons for transactions. EDD is also required for customers or accounts that are from or in countries that do not have adequate AML/CFT systems or are subject to sanctions or embargoes.

Among the four categories of customers or accounts listed in the question, lawyers, foreign exchange dealers, and precious metal dealers are considered as high-risk by the FATF and other international standards, and therefore require EDD. Lawyers may be involved in transactions that conceal the origin or ownership of illicit funds, such as creating shell companies, trusts, or foundations. Foreign exchange dealers may facilitate the movement of illicit funds across borders or jurisdictions, or provide anonymous or pseudonymous services. Precious metal dealers may deal with high-value goods that are easily convertible into cash, or may be used to launder proceeds of crime or evade sanctions.

Retail account holders, on the other hand, are generally considered as low-risk customers or accounts, unless they exhibit unusual or suspicious behavior or transactions. Therefore, they do not require EDD by default, but only when there are specific indicators of higher risk.

[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), pp. 75-76, 79-80.

FATF Guidance on Correspondent Banking Services, October 2016, pp. 7-8, 12-13.

Customer Due Diligence - Overview, Federal Financial Institutions Examination Council, April 2018, pp. 1-2,

5-6.

Customer due diligence, The Law Society, accessed on February 9, 2024.

Anti-Money Laundering (AML) Source Tool for Broker-Dealers, U.S. Securities and Exchange Commission, May 16, 2022, pp. 1-2, 5-6.

QUESTION NO: 30

一家公司對犯罪組織的吸引力程度受 (選擇兩項) 影響。

- A. 與該司法管轄區相關的年度費用金額。
- B. 允許發行不記名股票。
- C. 管轄區內實際所有權揭露的規則。
- D. 前往管轄區的便利程度。

Answer: B,C

The susceptibility of a company or jurisdiction to ML/TF abuse is significantly increased by:

* Permissibility of bearer shares (B): "Bearer shares make it easy to hide ownership and control, presenting a major risk for misuse by criminals." (CAMS 6th Edition, Beneficial Ownership and Company Transparency)

* Rules governing the disclosure of beneficial ownership by the jurisdiction (C): "Weak requirements or loopholes in beneficial ownership disclosure are frequently exploited to conceal criminal involvement in corporate structures." (CAMS 6th Edition, Chapter: Legal Persons and Arrangements) Incorrect Options:

* A: High or low fees are not a significant ML/TF risk driver.

* D: Ease of travel is unrelated to ML/TF risk related to company structures.

References:

CAMS 6th Edition, Beneficial Ownership and Transparency

FATF Recommendations 24, 25

QUESTION NO: 31

一家新成立的網路銀行聘請了一名反洗錢專家來評估該銀行面臨的洗錢威脅。因為它是一家線下銀行，所以專家最重要的建議是銀行

- A. 限制每筆交易可以處理的金額。
- B. 確保能夠正確識別潛在的新客戶。
- C. 設定自動化程序來分析交易是否有洗錢活動。
- D. 確保設定防火牆來保護交易。

Answer: B

One of the main challenges and risks for online banks is the verification of customer identity and the prevention of identity fraud. Online banks are more vulnerable to money laundering and terrorist financing because they do not have face-to-face contact with their customers and may rely on third-party sources or digital methods to verify customer information.

Therefore, the most important recommendation for the anti-money laundering expert to make is that the online bank ensures that prospective new customers can be properly identified and that their identity documents and information are verified using reliable and independent sources. This is also in line with the international standards and best practices for anti-money laundering and counter-terrorist financing, such as the FATF Recommendations, the Basel Committee on Banking Supervision principles, and the EU's Fifth Anti-Money Laundering Directive¹²³ The other options are less important or less effective than ensuring customer

identification. Limiting the amount that can be processed per transaction may reduce the exposure to large-scale money laundering, but it does not prevent the use of multiple transactions or accounts to launder smaller amounts. Setting up automated programs to analyze transactions for money laundering activity may enhance the detection and reporting of suspicious transactions, but it does not address the root cause of money laundering, which is the concealment of the source and ownership of illicit funds. Ensuring that a firewall is set up to protect the transactions may improve the security and confidentiality of the online banking system, but it does not prevent the misuse of the system by money launderers who have legitimate access to the system¹²³

1: Anti-Money Laundering Guide for Digital Banks by sanctions.io, 2022

2: The fight against money laundering: Machine learning is a game changer by McKinsey, 2021

3: FATF Guidance on Digital Identity, 2020

QUESTION NO: 32

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: C,D

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

QUESTION NO: 33

眾籌網站的合規官負責監控新的眾籌項目。

近期，眾籌項目數量明顯增加。

哪一個危險訊號顯示反洗錢風險最高？

- A. 捐贈者數量最多的人
- B. 在啟動後幾天內獲得資金的項目
- C. 具有最高財務成功門檻的項目
- D. 在很短的時間內啟動和結束並獲得全額資助的項目

Answer: D

According to the ACAMS study guide, one of the red flags for money laundering in crowdfunding platforms is "projects that are fully funded within a very short period of time, especially if the funding comes from a small number of donors or from a single donor" (p. 222). This could indicate that the project is a front for laundering illicit funds or financing terrorism. The other options are not necessarily indicative of money laundering risk, as they could be explained by legitimate factors such as the popularity, urgency, or ambition of the project.

ACAMS. (2020). Study Guide for the Certification Examination for Anti-Money Laundering Specialists (6th ed.). Miami, FL: ACAMS.

ESMA. (2015) Questions and Answers: Investment-based crowdfunding and money laundering/terrorist financing 1. Paris, France: ESMA.

QUESTION NO: 34

一家金融機構的董事被判犯有龐氏騙局洗錢罪並被解職。內部調查結果證明，一名員工協助了非法活動。

機構應該採取什麼行動？

- A. 對員工進行紀律處分，不採取進一步行動
- B. 對員工進行紀律處分並通知地方當局
- C. 由於該員工沒有受到指控，因此無需採取進一步行動
- D. 請所有員工完成額外的反洗錢培訓

Answer: B

If an employee of a financial institution is found to have assisted in money laundering or any other criminal activity, the institution should take appropriate disciplinary action and report the employee to the relevant authorities. This is not only a legal obligation, but also a sound compliance practice to protect the institution's reputation and integrity. Disciplining the employee without informing the authorities would be insufficient and potentially expose the institution to further legal risks. Ignoring the employee's involvement or requiring additional training for all employees would be ineffective and inappropriate responses.

ACAMS CAMS Certification Package - 6th Edition, Chapter 5: Compliance Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), pp. 121-1221

ACAMS CAMS Certification Package - 6th Edition, Chapter 6: AML Compliance Program, pp. 143-1441
ACAMS CAMS Certification Video Training Course, Module 5: Compliance

Standards for Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT), Lesson 5.2: International Standards and Best Practices2 ACAMS CAMS Certification Video Training Course, Module 6: AML Compliance Program, Lesson 6.4: Internal Controls2

QUESTION NO: 35

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: C

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