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**Exam** : **CAMS-JP**

**Title** : Certified Anti-Money  
Laundering Specialists  
(CAMS日本語版)

**Vendor** : ACAMS

**Version** : DEMO

**QUESTION NO: 1**

テロ資金対策 ( CFT )

どのようなプライベートバンキングの状況で、WolfsbergグループのAML原則に従ってデューデリジェンスアクションを実施する必要がありますか？

- A. 地元の裕福な個人が、地元の小売銀行の顧客になりたいと考えています。
- B. 両替所の実質的所有者が銀行に口座を開けたいと考えています。
- C. 高リスク国の富裕層がプライベートバンクに口座を開けたいと考えています。
- D. 新規顧客が銀行を取引先として両替所を設立するよう依頼します。

**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**

国連が制裁体制を開発する際の主な目的は次のとおりです。(3つ選択してください。)

- A. 紛争の平和的解決において政府や政権を支援する。
- B. 各国における非民主的かつ非憲法的な変更を抑止するため。
- C. 発展途上国に自由民主主義または実質的民主主義を採用するよう強制すること。
- D. 金融犯罪対策が不十分な政府を罰するため。
- E. 人権の擁護を支援する。

**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**

ある潜在顧客が証券会社に電話をかけ、証券を購入しようとしています。顧客は口座手数料や証券価格に関心がないようです。潜在顧客から提供された詳細情報から、潜在顧客が投資を希望する企業に親族が勤務している可能性が示唆されています。潜在顧客はどのような種類の活動に関与しようとしているのでしょうか？

- A. 第三者に資金を送金する
- B. 預金口座としての利用
- C. 親族への価値の移転
- D. インサイダー情報の利用

**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

信託および資産管理サービスの悪用によってどのようなマネーロンダリングのリスクが生じますか？(3つ選択してください。)

- A. 資金源の隠蔽
- B. 第三者による資金の保管を可能にする
- C. トランザクションに匿名性を追加する
- D. 真の法的所有者と実質的所有者の隠蔽
- E. 不動産取引のためのエスクロー口座の設立

**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**

テロ資金供与 ( CFT )

違法伐採に関与している企業に関して、危険信号となるのはどれですか? (3つ選択してください。)

- A. 企業登録活動は環境保護の推進を規定している
- B. 会社の接続銀行口座を通じた取引件数が多い
- C. 紙包装需要の生産
- D. 遠方の管轄区域への木材の迅速な輸送
- E. 保護されていない区域での重機の使用
- F. 幹部と政治的に重要な人物との関係

**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**

次の法律または規制のうち、AML/CFT

プログラムの適用に影響を与え、金融機関に複数のコンプライアンス要件のバランスを取ることを要求するものはどれですか。

A. 消費者保護法は、顧客の苦情や紛争を処理する際に AML/CFT 要件と交差する可能性があり、金融機関がコンプライアンスプログラムを実装する方法に影響を及ぼす可能性があります。

B.

AML/CFT法は金融機関にとって主な焦点であり、データプライバシーや消費者保護などの他の規制は、コンプライアンス義務に間接的にしか影響を与えない可能性がある。

C.

環境、社会、ガバナンス ( ESG ) フレームワークは、FIのリスク管理戦略に影響を与える可能性があります。一般的には、AML/CFTコンプライアンスのコア要件とは別のものと考えられています。

D.

データプライバシー法では顧客情報の共有が制限される一方、金融包摂イニシアチブでは金融機関に対し、脆弱な層を排除する可能性のある過度のリスク軽減を避けるよう求めています。

**Answer:** D

**QUESTION NO: 7**

マネーロンダリングの社会的、経済的影響を正確に説明しているのはどれですか?

A. マネーロンダリングは経済成長にとって極めて重要な金融セクターに影響を及ぼします。

**B.**

外国投資家は、合法的な経済活動に有利な条件と同じ条件が満たされるため、マネーロンダリング活動が盛んな管轄区域に惹かれることが多い。

**C.**

マネーロンダラーは通常、フロントビジネスを通じて活動している管轄区域で支払われるべき税金を送金します。

**D.**

マネーロンダリングが増加すると、通常、利益が管轄区域内に再投資されるため、経済の安定性が高まります。

**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

テロ資金供与 ( CFT )

金融活動作業部会 40

の勧告に従って、国境を越えたコルレス銀行業務を行う金融機関はどのような行動を取る必要がありますか？

**A.** 政治的に影響力のある顧客のリストを収集する

**B.** 5%以上の株式を所有または支配する自然人を特定する

**C.** 関係を確立する前に上級管理職の承認を得る

**D.**

回答者のマネーロンダリング対策プログラムについて第三者による独立したレビューを取得する

**Answer: C**

According to the Financial Action Task Force (FATF) 40 Recommendations, financial institutions should obtain senior management approval before establishing new correspondent banking relationships<sup>1</sup>. 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 procedures<sup>1</sup>. Additionally, the FATF recommends that financial institutions document the respective responsibilities of each institution and prevent the use of their accounts by shell banks<sup>1</sup>.

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

金融機関に重要なマネーロンダリングリスクを提供するオンラインバンキングについて正しい3つのステートメントはどれですか？

**A.**

オンラインバンキングの性質により、誰が口座を管理しているかを特定するのが困難になる場合があります

**B.**

インターネットを介したアクセスの容易さにより、国境を越えた資金移動が可能になります

**C.**

クライアントの機密性のため、オンラインで収集された情報は、単なる疑いで法執行機関と共有することはできません

**D.**

電子トランザクションの速度により、短時間で複数の複雑なトランザクションを実行できます。

**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**

テロ資金供与 ( CFT )

金融活動作業部会地域型機関の目標は何ですか？

**A.** 勧告に応じて健全なAMLプロセスを実行する

**B.** 現地のAML法と規制の施行

**C.**

犯罪者やテロリストが地域の金融システムを悪用する新しい手法や開発中の手法を分析する

D. メンバーが適切なAML体制を備えているかどうかを評価するための基準の設定

**Answer: C**

**QUESTION NO: 11**

テロ資金対策 ( CFT )

米国外の銀行が米国のコルレス銀行に対し、顧客が前提犯罪に関与した場合にコルレス口座の資金が差し押さえられるリスクがあるかどうかを尋ねます。コルレス銀行の回答は次のようになります。

A.

「いいえ、管轄当局によって差し押さえられ、没収されるのは米国国民の米国アカウントのみです。」

B.

「いいえ、政府機関によって差し押さえられ、没収されるのは、米国の銀行のコルレス口座のみです。」

C. 「はい、マネーロンダリングが米国内でのみ発生したと疑われる場合」

D.

「はい、顧客のアカウントが米国以外の国でマネーロンダリングの疑いのある者によって使用されている場合も同様です。」

**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**

証券業界内でマネーロンダリングの可能性あることを示す一般的な指標は次のどれですか？

(2つ選択してください。)

A. 配偶者の死亡に伴い、既存の証券口座に証券を受け取る

B. 固定利付証券の満期を許可する

C. 証券口座を預金口座のように使う

D. 名義人または第三者が関与する取引に従事する

**Answer: C,D**

**QUESTION NO: 13**

オフショア管轄内の銀行は、新しいコルレス銀行関係の開設について金融機関に打診しました。口座を開設する前に、新しい口座担当者は、オフショア銀行のマネーロンダリング防止ポリシーと手順、および銀行に関するすべての適切な法的文書のコピーを入手します。第三

者がアカウントにアクセスできないことを確認します。そして、銀行の所有者、銀行の主な事業活動、および銀行の所在地を決定します。バーゼル銀行監督委員会の銀行向け顧客デューデリジェンスペーパーは、石油特派員口座を開設する前に銀行家に推奨する手順は次のうちどれですか？

1. 現場訪問を実施し、すべての本人および受益者と直接面会します。
2. 銀行が設立された国に物理的に存在していることを確認します。
3. 銀行が適切なマネーロンダリング防止法による規制監督の対象であることを確認します。
- 4.

政治的に暴露された人物を含む、コルレス銀行の顧客の完全なリストを入手し、維持します。

- A. 1 と 2 のみ
- B. 1 と 4 のみ
- C. 2 と 3 のみ
- D. 3 と 4 のみ

**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

銀行は、有名な弁護士がクライアントの資金を管理するための新しい口座を開設しました。最初の6か月間、銀行のスタッフは口座が電信送金で複数の預金を受け取ることを観察しました。彼らはまた、弁護士が現金を引き出し、さまざまな人々に支払いを行い、オンラインで法律事務所の口座に資金を送金していることを観察しました。

この状況でマネーロンダリングが発生する可能性がある場合、何が危険信号と見なされますか？

- A. 現金の引き出し
- B. さまざまな人への支払い
- C. 電信送金で複数の入金を受け取る
- D. オンラインで法律事務所の口座に資金を送金する

**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

法執行機関は、金融機関の顧客の財務記録へのアクセスをどの2つの状況で許可されますか？（2つ選択してください。）

- A. 疑わしいトランザクションレポートで名前が付けられている場合
- B. 法執行機関が法的召喚状または召喚状を提供する場合
- C. 顧客の調査がメディアで公開されている場合
- D. 法執行機関がマネーロンダリングを疑う状況証拠を持っている場合

**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 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 purposes<sup>1</sup>.

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 appropriate<sup>2</sup>. 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

規制検査レポートの調査結果では、コンプライアンス部門外の従業員の職務記述書にはマネ

ーロンダリング防止責任への言及は含まれていません。

会社はどのアクションを実行する必要がありますか？

- A. すべてのジョブの説明を更新して、マネーロンダリング防止の責任を含める
- B. コンプライアンス担当者のみがマネーロンダリング防止の責任を負っていることに対応する
- C. マネーロンダリング防止ポリシーを順守する必要があることを記載したメールをすべてのスタッフに送信します
- D. マネーロンダリング防止の責任の説明が年次トレーニングに含まれていると回答

**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 department<sup>1</sup>. 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 organization<sup>1</sup>. 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

FATF スタイルの地域機関 (FSRB) の役割は次のとおりです。(3 つ選択してください。)

- A. FSRB の管轄外の会員から発信された類型を発行することで、現在の金融犯罪の傾向を特定し、対処します。
- B. FSRB の管轄権においてメンバーが必要とする AM L/C FT 技術支援を提供します。
- C. FSRB 管轄区域内のメンバーへの技術支援を調整する
- D. FSRB 管轄区域内のメンバーに対して FATF 40 勧告を設定および修正します。

- E. FSRB の管轄外のメンバーに対する AML/CFT ポリシーのギャップを特定し、対処します。
- F. FSRB 管轄内のメンバーに相互評価とフォローアップのプロセスを提供します。

**Answer:** B,C,F

#### QUESTION NO: 18

テロ資金供与 ( CFT )

疑わしい行為に関する報告書 ( SAR ) を作成する場合、取締役会または指定された専門委員会に提供する必要のあるのはどれですか。

- A. 報告期間中に提出されたSARのすべての詳細
- B. 報告期間中にSARが提出されたすべての顧客の名前
- C. 報告期間中に提出されたSARに関する統計データ
- D. 報告期間中に提出されたすべてのSARのコピー

**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

銀行は数年間、ヨーロッパの慈善団体の口座を維持しています。この慈善団体は、さまざまな国で活動的なテロリストの部屋を必要とする人々に衣服を提供しています。

慈善団体によるどの行動がテロ資金調達の可能性を示していますか？

- A. 慈善団体は頻繁に銀行から現金を引き出します
- B. 慈善団体には、さまざまな国に支店があります
- C. 慈善団体は主にヨーロッパ諸国からの現金寄付を受け取ります
- D. 慈善団体は、非ビジネス関連費用の銀行口座を維持しています

**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 detection<sup>12</sup>.

Reference:<https://www.fatf->

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

**QUESTION NO: 20**

すべてのマネーロンダリング防止プログラムに一般的に必要な要素はどれですか？

- A. コンピューターベースの不審なアクティビティ監視システム
- B. プログラムを管理する資格のあるコンプライアンスオフィサー
- C. 全従業員向けの年次対面AMLトレーニング
- D. すべての新規顧客向けの強化されたデューデリジェンスプログラム

**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 authorities<sup>12</sup>. The compliance officer should have sufficient authority, resources, and expertise to perform these duties effectively.

Anti-Money Laundering (AML) | FINRA.org<sup>1</sup>

Anti-Money Laundering Program and Suspicious Activity Reporting Requirements For Insurance Companies Frequently Asked Questions | FinCEN.gov<sup>2</sup>

**QUESTION NO: 21**

テロ資金供与 ( CFT )

金融機関が特定の口座に関して STR

を提出する場合、金融機関はビザアカウントに関してどのような手順を踏む必要がありますか？

- A. 金融機関は、明らかなリスクがあるため、口座を閉鎖すべきである。
- B. 金融機関はアカウントを継続的に監視する必要があるため、アカウントを開いたままにしておく必要があります。
- C. 金融機関は、弁護士およびAMLコンプライアンス担当者に相談し、口座の閉鎖が金融機関の手続きに沿っているかどうかを判断する必要があります。
- D. 顧客に密告し、刑事捜査を混乱させるリスクがあるため、金融機関は口座を閉鎖すべきではない。

**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**

生命保険会社にとって、マネーロンダリングに関連する危険信号は次のどれですか? (2つ選択してください。)

- A. 保険料を数年分前払いし、早期解約して払い戻しを受ける
- B. 複数の保険契約を持つ自然人
- C. 高額な保険金が支払われる高額生命保険
- D. 定期的にポリシーを変更し、ペナルティを受け入れる
- E. 高齢者への受益者給付

**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**

疑わしい活動の監視に加えて、電子監視システムも何の価値がありますか?

- A. 顧客が製品をどのように使用しているかを特定する
- B. システムアナリストのスキルを強調する
- C. FIUが仕事をしていることを取締役会に証明する
- D. システム実装のための必須の規制要件を満たす

**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**

管理が不十分なオンラインバンキング

システムを通じたマネーロンダリングを促進する可能性が最も高い活動はどれですか?

- A. 大量のトランザクションの実行

- B. 世界中からの継続的なアクセスを提供
- C. 匿名トランザクションの実行
- D. 高額トランザクションの実行

**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 transactions<sup>123</sup>.

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

外国管轄の法執行機関 (LEA) は、金融機関 (FI) の顧客の 1 人に関して、金融機関 (FI) に連絡します。LEA

は、一連の人身売買の罪状の結果として、クライアントが現在訴追を求められていることを通知します。FIは何をすべきですか？(2 つ選択してください。)

**A.**

クライアントのアクティビティを確認し、疑わしいアクティビティが存在するかどうかを判断し、それに応じて報告します。

**B.** 身柄引き渡しのために政府に連絡する必要があることを LEA に伝えます。

**C.** 外国法域に直ちに従い、すべての顧客情報を引き渡す。

**D.** 地域の LEA および規制当局に、意識向上の要請を通知します。

**E.** 過度のリスクを避けるために、クライアントのアカウントをすぐに閉鎖してください。

**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

**テロ資金供与 ( CFT )**

大手金融機関のコンプライアンス担当者は、他の金融機関の規制執行措置を受けて、社内レビューと顧客オンボーディング

プログラムの変更の可能性についてチームを率いるよう上級管理職から指示を受けました。コンプライアンス担当者は最初にどの手順を実行する必要がありますか？

- A. 機関のリスク評価の見直し
- B. 最前線スタッフ向け研修資料の改訂
- C. 高リスク顧客に対する強化されたデューデリジェンスの実施
- D. 顧客検証における実質的な矛盾の解決

**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****テロ資金対策 ( CFT )**

大手金融機関 ( FL ) は、AML法の緩い地域への事業拡大を検討しています。リスクベースの評価によると、当該地域はFLのリスク許容度を規定の許容範囲を超えて引き上げる必要があります。FLの優先順位を決定するために、どのようなリスク要因を用いるべきでしょうか？

- A. 地理的リスク
- B. 未知のサードパーティリスク
- C. 現金集約型ビジネスのリスク
- D. 匿名取引のリスク

**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**

テロ資金対策 ( CFT )

大量の電信送金の入金があった場合、顧客に関するアラートが発生します。資金は現金引き出しと電信送金によって即座に引き落とされます。このアラート/ケースを調査するには、まずどの情報を確認すべきでしょうか？

- A. 顧客プロフィール
- B. 不適切メディア検索
- C. アカウントアクティビティ
- D. オープンソース情報

**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**

国際基準の最近の変更を評価した後、マネーロンダリング防止の専門家は、

1. 弁護士。
2. 外国為替ディーラー。
3. リテールアカウント所有者。
4. 貴金属ディーラー。

- A. 1、2、および3のみ
- B. 1、2、および4のみ
- C. 1、3、および4のみ

**D. 2、3、および4のみ****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**

企業が犯罪組織に抱く魅力の度合いは、(2 つ選択) によって左右されます。

- A. 管轄区域に関連付けられた年間料金の額。
- B. 無記名株式の許可。
- C. 管轄区域による実質的所有権の開示を規定する規則。
- D. 管轄区域への移動のしやすさ。

**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

マネーロンダリング防止の専門家が新しいインターネット銀行に雇われ、銀行に対するマネーロンダリングの脅威を評価します。

○行銀行であるため、専門家が行うべき最も重要な推奨事項は、銀行

A. トランザクションごとに処理できる量を制限します。

B. 見込み客を適切に特定できるようにします。

C.

マネーロンダリングアクティビティのトランザクションを分析する自動プログラムを設定します。

D.

トランザクションを保護するためにファイアウォールが設定されていることを確認します。

**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 moneylaundering 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 Directive<sup>123</sup> 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 system<sup>123</sup>

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**

テロ資金供与 ( CFT )

A銀行は、前回の規制当局による検査でAMLプログラムに弱点が指摘されたことを受け、規制当局による検査に向けて準備を進めています。前回の検査以降、同銀行は以下の取り組みを行ってきました。

- \* AMLプログラムの改善
- \* 経験豊富なAMLコンプライアンス担当者を採用
- \* より強力なコンプライアンス文化を実証
- \* 取引監視ケースのバックログを解消し、制裁スクリーニング

プログラムを強化することに重点を置いています。次のうち正しいものはどれですか? (2つ選択してください。)

**A.**

同銀行は、これまでの懸念事項の多くに対処しているにもかかわらず、世界の金融機関から二次的な制裁を受ける可能性が高い。

**B.**

規制命令は機密に保持される必要があるため、銀行はあらゆる規制措置から生じる評判リスクから保護されます。

**C.** 銀行は、以前の懸念事項の多くに対処したにもかかわらず、AML

プログラムを修正するよう規制当局から命令されるリスクに直面する可能性があります。

**D.**

銀行が以前の懸念事項に対処するための持続的な改善を実証できない場合、民事罰または刑事罰に直面する可能性があります。

**E.**

規制当局は、銀行の評判リスクを制限するために、銀行の取締役会に以前の懸念に対処するために講じた措置を公表するよう要求する場合があります。

**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**

クラウドファンディングWebサイトのコンプライアンス担当者は、新しいクラウドファンディングプロジェクトの監視を担当しています。

最近、クラウドファンディングプロジェクトの数が大幅に増加しました。どの赤旗がマネーロンダリング防止のリスクが最も高いかを示していますか？

- A. ドナーの数が最も多いもの
- B. 開始から数日以内に資金を得るプロジェクト
- C. 金銭的成功のしきい値が最も高いプロジェクト
- D. 非常に短い期間内に開始および終了し、完全に資金提供されるプロジェクト

**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**

ある金融機関の理事は、ポンジー計画の一環として資金を洗浄した罪で有罪となり、解雇された。内部調査の結果、従業員が違法行為を支援したという証拠が判明しました。

機関はどのような行動を取るべきですか？

- A. これ以上のアクションなしで従業員を懲戒する
- B. 従業員を懲戒し、地方自治体に通知する
- C. 従業員は請求されなかったため、これ以上のアクションは不要です。
- D. すべての従業員に追加のマネーロンダリング防止トレーニングを完了するよう要求する

**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 Practices<sup>2</sup> ACAMS CAMS Certification Video Training Course, Module 6: AML Compliance Program, Lesson 6.4: Internal Controls<sup>2</sup>

**QUESTION NO: 35**

テロ資金供与 ( CFT )

オフショアライセンスに基づいて営業している外国銀行が、米国銀行にコルレス口座を開設したいと考えています。この外国銀行は、一部の顧客に対し、口座を通じた支払いサービスを提供する予定です。

米国愛国者法に基づき、外国銀行は米国銀行に何を提供しなければならないのでしょうか？

- A. コルレス銀行の所有者である政治的に重要な人物のリスト
- B. 支払口座を利用する金融機関の口座名義人のリスト
- C. コルレス銀行の法的手続きの送達を受けることができる米国内の人物
- D.

口座取引を通じて支払いを監視する金融機関の従業員に対するマネーロンダリング防止トレーニング記録のリスト

**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 account<sup>1</sup>. 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 requests<sup>2</sup>.

USA PATRIOT Act, Section 319(b)(2)(A)<sup>1</sup>

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](https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/CBDDQ-Capacity-Building/ Wolfsberg%27s_CBDDQ_Capacity_Building_Guidance_Final%20V1.1.pdf)