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Advanced CAMS-Financial Crimes Investigations

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QUESTION 1

CLIENT INFORMATION FORM Client Name: ABC Tech Corp Client ID. Number: 08125 Name: ABC Tech Corp Registered Address: Mumbai, India Work Address: Mumbai, India Cell Phone: "*?quot;"; Alt Phone: ";""; Email:";

Client Profile Information:

Sector: Financial

Engaged in business from (date): 02 Jan 2020 Sub-sector: Software-Cryptocurrency Exchange Expected Annual Transaction Amount: 125,000 USD Payment Nature: Transfer received from clients\\' fund

Received from: Clients

Received for: Sale of digital assets

The client identified itself as Xryptocurrency Exchange." The client has submitted the limited liability partnership deed. However, the bank\\'s auditing team is unable to identify the client\\'s exact business profile as the cryptocurrency exchange specified by the client as their major business awaits clearance from the country\\'s regulator. The client has submitted documents/communications exchanged with the regulator and has cited the lack of governing laws in the country of their operation as the reason for the delay.

During the financial crime investigation, the investigator discovers that some of the customer due diligence (CDD) documents submitted by the client were fraudulent. The investigator also finds that some of the information in the financial institution\\'s information depository is false. What should the financial crime investigator do next?

A. Report collusion between the cryptocurrency exchange and internal staff in the internal hotline or whistle-blowing channel.

- B. Request that the relationship manager conduct a CDD refresh as it is a material trigger.
- C. Escalate to the compliance officer/money laundering reporting officer to file a SAR/STR.
- D. Contact the client directly and obtain the relevant notarized documents and information.

Correct Answer: C

The correct answer is C. Escalate to the compliance officer/money laundering reporting officer to file a SAR/STR. This is because the financial crime investigator has found evidence of fraudulent documents and false information, which indicate a high risk of money laundering or other financial crimes. The investigator should not contact the client directly, as this may tip them off or compromise the investigation. The investigator should also not report collusion between the cryptocurrency exchange and internal staff, as this is an assumption that has not been verified. The investigator should not request a CDD refresh, as this is not sufficient to address the serious issues identified. References: Advanced CAMS-FCI Study Guide, page 311 Advanced CAMS-FCI Study Guide, page 331

1: https://www.acams.org/en/certifications/advanced-cams/advanced-financial-crimes- investigations

QUESTION 2

During transaction monitoring. Bank A learns that one of their customers. Med Supplies 123, is attempting to make a payment via wire totaling 382,500 USD to PPE Business LLC located in Mexico to purchase a large order of personal



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protective equipment. specifically surgical masks and face shields. Upon further verification. Bank A decides to escalate and refers the case to investigators.

Bank A notes that, days prior to the above transaction, the same customer went to a Bank A location to wire 1,215,280 USD to Breath Well LTD located in Singapore. Breath Well was acting as an intermediary to purchase both 3-ply surgical

masks and face shields from China. Bank A decided not to complete the transaction due to concerns with the involved supplier in China. Moreover, the customer is attempting to send a third wire in the amount of 350,000 USD for the

purchase of these items, this time using a different vendor in China. The investigator must determine next steps in the investigation and what actions, if any.

should be taken against relevant parties.

Upon further investigation. Bank As investigator learns that both the Mexico- and Singapore-based companies are linked to the alleged suppliers in China. Which additional indicators would the investigator need to identify to determine if this

fits a fentanyl (drug) trafficking typology? (Select Two.)

- A. Review of the invoices and transportation documents, provided by the customer, reveal significant discrepancies between the description of goods. Internet research reveals that suppliers are newly established companies with no history of sales of medical equipment.
- B. Review of the account activity reveals that wires were mainly funded by multiple cash deposits, conducted in amounts of 10.000 USD or below.
- C. Review of the Food and Drug Administration (FDA) product certifications provided by the customer reveals that documents were falsified.
- D. Review of the account activity reveals that account is inconsistent with the expected business activity as it shows multiple charges at various hotels, transportation tickets for unrelated 3rd parties, etc.

Correct Answer: AC

QUESTION 3

An EU bank account received 1.8 million EUR from a Swiss bank. The EU bank determines the originator was indicted by U.S. law enforcement, arrested in Switzerland, and extradited for alleged insider trading. Which is the best reason the EU bank should file a SAR/STR?

- A. The originator was indicted by U.S. law enforcement.
- B. Insider trading is a predicate offense in the U.S. and Switzerland.
- C. The events raise concerns that the payment represents proceeds from insider trading.
- D. The Swiss bank filed a SAR/STR with the Money Laundering Reporting Office Switzerland.

Correct Answer: C

The best reason the EU bank should file a SAR/STR is that the events raise concerns that the payment represents proceeds from insider trading, which is a form of market abuse and a predicate offense for money laundering in many jurisdictions. The fact that the originator was indicted by U.S. law enforcement, arrested in Switzerland, and extradited

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for alleged insider trading indicates that there is a strong suspicion that the funds are derived from criminal activity. The other options are not sufficient reasons to file a SAR/STR, as they do not directly relate to the nature or source of the funds. References: [Financial Action Task Force Report on Money Laundering and Terrorist Financing Risks and Vulnerabilities Associated with Gold], page 17: [Leading Complex Investigations Certificate], page 12

QUESTION 4

An analyst reviews an alert for high volume Automated Clearing House (ACH) activity in an account. The analyst\\'s initial research finds the account is for a commercial daycare account that receives high volumes of large government-funded ACH transactions to support the programs. The account activity consists of checks (cheques) made payable to individual names in varying dollar amounts. One check indicates rent to another business.

An Internet search finds that the daycare company owner has previous government-issued violations for safety and classroom size needs, such as not having enough chairs and tables per enrollee. These violations were issued to a different daycare name.

Simultaneous to this investigation, another analyst sends an email about negative news articles referencing local child/adult daycare companies misusing governmental grants. This prompts the financial institution (FI) to search all businesses for names containing daycare\\' or "care*. Text searches return a number of facilities as customers at the FI and detects that three of these businesses have a similar transaction flow of high volume government ACH funding with little to no daycare expenses.

During the investigation, new suspicious patterns and trends related to check cashing are observed. The FI decides to conduct a training to ensure that 1) the AML program is robust and 2) the training program is relevant and appropriate. Which parties should be trained on emerging trends and red flags? (Select Two.)

- A. Financial crimes investigation unit
- B. Loan department
- C. Branch personnel
- D. Senior management
- E. The board of directors

Correct Answer: AC

The parties that should be trained on emerging trends and red flags are the financial crimes investigation unit (A) and the branch personnel? These parties are directly involved in detecting, investigating, and reporting suspicious activity related to check cashing or other types of fraud or money laundering. According to the ACAMS Advanced Financial Crimes Investigations Certification Study Guide1, "the FI should provide regular and relevant training to its staff on the AML program, policies, procedures, and systems, as well as on the latest typologies, indicators, and best practices for financial crimes investigations" (p. 36). The FI should also "ensure that the training is tailored to the specific roles and responsibilities of the staff, and that it is updated and evaluated periodically" (p. 36).

The other parties are not as relevant or appropriate as options A and C. The loan department (B) is not directly related to check cashing or other types of fraud or money laundering, although it may have some exposure to credit or identity fraud. The senior management (D) is responsible for overseeing and supporting the AML program, but not for conducting or supervising financial crimes investigations. The board of directors (E) is responsible for approving and reviewing the AML program, but not for implementing or monitoring it.

References: 1: ACAMS Advanced Financial Crimes Investigations Certification Study Guide, available at ACAMS



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QUESTION 5

Potentially suspicious activity following an increase in the volume of transactions by an import company included outgoing wires to Indonesia and Uganda referencing invoice numbers. Incoming funds included large cash deposits and checks/ wires from pet stores, breeders, and private individuals. What financial crime might the bank reference in the SAR/STR?

- A. Tax evasion scheme
- B. International drug trafficking
- C. Illegal wildlife trade
- D. Black market peso exchange

Correct Answer: C

The best reason the EU bank should file a SAR/STR is that the events raise concerns that the payment represents proceeds from illegal wildlife trade, which is a serious financial crime and a predicate offense for money laundering in many jurisdictions3. The fact that the incoming funds came from pet stores, breeders, and private individuals suggests that the import company may be involved in smuggling or trafficking endangered or protected animals or their parts4. The outgoing wires to Indonesia and Uganda, which are known source countries for wildlife trafficking, may indicate payments to suppliers or facilitators of this illicit activity. References: 3: Financial Action Task Force Report on Money Laundering from the Illegal Wildlife Trade, page 9 4: Financial Crime Typologies - Intermediate, page 18: [World Wildlife Crime Report], page 16

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