



# CAMS-FCI<sup>Q&As</sup>

Advanced CAMS-Financial Crimes Investigations

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## QUESTION 1

During transaction monitoring, Bank A learns that one of its 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 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 the next steps in the investigation and what actions, if any,

should be taken against relevant parties.

The investigator is gathering more information to determine if a SAR/STR filing is needed. Which steps are the correct ways of collecting the additional information? (Select Two.)

- A. Reach out to the relationship manager asking if more up-to-date customer due diligence information can be collected on the customer.
- B. Use available documentation received from law enforcement (e.g., grand jury subpoena) as red flags in SAR/STR filing.
- C. Reach out to the customer and ask for supporting documentation for the conducted wires to avoid SAR/STR filing.
- D. Conduct open-source research to determine if the customer and involved counterparties are in the same business field.
- E. Issue a USA PATRIOT ACT Section 314(b) request to participating financial institutions advising that information is needed to decide if the activity is suspicious.

Correct Answer: AD

The correct answer is A and C because these indicators suggest that the customer is using fraudulent documents and misrepresenting the goods to conceal the illicit nature of the transactions. Fentanyl traffickers often use front companies

and falsified invoices to disguise their shipments as legitimate products, such as medical supplies or chemicals. Reviewing the invoices and transportation documents, as well as the FDA product certifications, can help to identify

discrepancies or anomalies that indicate fraud or deception.

References: Fentanyl and Fentanyl Analogues: Federal Trends and Trafficking Patterns, page 18; Fentanyl Trafficking Offenses, page 2.

## QUESTION 2

The investigations team of a financial institution (FI) wants to perform enhanced due diligence measures on operations



done by a foreign bank related to transactions of companies that export scrap gold and silver. What would be the next best steps for the investigations team? (Select Two.)

- A. Ask the legal department if it can proceed to rescind the contract of the correspondent banking relationship since the export of scrap gold and silver is a high-risk activity.
- B. Ask the respondent bank if it has a risk rating for the exporting companies, if the customer profiles are updated, and if so, when was the last time it was done.
- C. Ask the respondent bank if the exporting companies have obtained an official license that permits the exporting of scrap gold and silver.
- D. Ask the respondent bank if it can file a SAR/STR in its jurisdiction since the investigations team also plans to do the same in the FI's home country.
- E. Ask the business manager who handles the relationship of the respondent bank if they can persuade the bank to close the accounts of the export companies.

Correct Answer: BC

The correct answers are B and C because these are the most relevant and reasonable steps for the investigations team to perform enhanced due diligence on the operations of the foreign bank and its customers. Asking for the risk rating, customer profiles, and official licenses would help the team assess the level of risk and compliance of the foreign bank and its customers, who are engaged in a high-risk activity of exporting scrap gold and silver. The other options are not appropriate because they are either premature or ineffective. Rescinding the contract, filing a SAR/STR, or closing the accounts would require more evidence and justification, and they may also damage the relationship with the foreign bank. References: : Precious Metals and Stones

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### QUESTION 3

During a review of the accounts related to Richard Aston, an investigator notices a high number of incoming payments from various individuals.



An investigator at a financial institution (FI) receives an automated transaction alert based on average KYC data within the institution.

Client name	Risk rating	Profession	Country of Tax Residence	Annual Income as per KYC	Monthly Transaction Volume (Month 1)	Monthly Transaction Volume (Month 2)	Monthly Transaction Volume (Month 3)	Average Monthly Spending
Mike Jacob	Low	Accountant	Cyprus	\$ 45,000	\$ 3,251.00	\$ 8,777.70	\$11,378.50	\$ 525.00
Carl Ahmad	High	Car Dealer	Cyprus	\$ 350,000	\$ 9,333.33	\$12,600.00	\$10,360.00	\$ 6,708.33
Farah Zein	Medium	Owner of Travel Agency	Cyprus	\$ 180,000	\$ 4,800.00	\$ 6,480.00	\$ 5,328.00	\$ 4,200.00
Henry Lock	High	Owner of Jewelry Store	Cyprus	\$ 630,000	\$ 16,800.00	\$36,960.00	\$18,648.00	\$ 9,975.00
Jason Right	Low	Teacher	Cyprus	\$ 62,000	\$ 1,653.33	\$ 2,232.00	\$ 1,835.20	\$ 1,395.00
Nadine Kien	High	Trader	Cyprus	\$ 280,000	\$ 7,466.67	\$ 10,080.00	\$ 8,288.00	\$ 5,600.00
May Clous	Low	Employee at a bank	Cyprus	\$ 54,000	\$ 1,440.00	\$ 1,944.00	\$ 1,598.40	\$ 765.00
Richard Aston	Medium	Hotel Manager	Cyprus	\$ 120,000	\$ 3,200.00	\$ 4,320.00	\$ 3,552.00	\$ 1,800.00
Mason Jacob	High	Ecommerce business owner	Cyprus	\$ 430,000	\$ 11,466.67	\$15,480.00	\$28,666.67	\$ 9,316.67
Joshua White	Low	Manager at engineering company	Cyprus	\$ 90,000	\$ 2,400.00	\$ 3,240.00	\$ 2,664.00	\$1,470.00

They also notice that these incoming payments typically occur during large sporting events or conferences. As a result of the account review, of which illegal activity does the investigator have reasonable grounds to suspect Richard Aston?

- A. Embezzling from the hotel
- B. Aftermarket sales of entertainment admission tickets
- C. Human trafficking
- D. Sports betting

Correct Answer: B

The illegal activity that the investigator has reasonable grounds to suspect Richard Aston of is aftermarket sales of entertainment admission tickets. This is because aftermarket sales of entertainment admission tickets involve reselling tickets for events, concerts, festivals, etc. at a higher price than their face value, often through online platforms or scalpers. This practice can be illegal or unethical, depending on the jurisdiction and the terms and conditions of the original ticket seller. The investigator should look for indicators of aftermarket sales of entertainment admission tickets, such as high volume or frequency of incoming payments from various individuals, correlation between incoming payments and major events or conferences, and discrepancy between the customer's profile and the nature of the



transactions. The other options are incorrect because:

A. Embezzling from the hotel is not likely, as it would involve stealing money or property from the hotel by an employee or a person in a position of trust. There is no evidence that Richard Aston works for or has access to the hotel's assets.  
C. Human trafficking is not probable, as it would involve exploiting people for forced labor or commercial sexual exploitation. There is no indication that Richard Aston is involved in any form of human trafficking or has any connection to victims or perpetrators.  
D. Sports betting is not plausible, as it would involve wagering money on the outcome of sporting events or games. There is no sign that Richard Aston is engaged in any sports betting activity or has any association with bookmakers or gamblers.  
References: Advanced CAMS-FCI Certification | ACAMS, Section 2: Investigating Financial Crimes, page 10  
TicketSwap: The safest way to buy and sell tickets Ticketing 101 | Ticketmaster  
10 Types of Tickets For Events (+ Why and When To Use Them) - Eventbrite

#### QUESTION 4

In the past 6 months, a small financial institution (FI) has received regular remittances that are increasing in value from a country with high piracy activity. The FI's AML officer (AMLO) has also noted that piracy in this country has increased in the same time frame. Which recommendation should the AMLO make?

- A. Request the operations department to return inbound remittances when the sender of funds is from this country.
- B. Upgrade the transaction monitoring system of the FI to include more fields so that more in-depth information is collected about the inward remittances.
- C. File a SAR/STR to the appropriate AML authority immediately.
- D. Conduct an in-depth investigation into accumulated remittance information in the past year to find the trend of such transactions.

Correct Answer: D

Verified Answer: D The recommendation that the AMLO should make is to conduct an in-depth investigation into accumulated remittance information in the past year to find the trend of such transactions. This is because the regular and

increasing remittances from a country with high piracy activity may indicate a possible link to illicit funds derived from piracy or other criminal activities. According to the World Bank, remittances are often used as a channel for money

laundering and terrorist financing, especially when they originate from or are destined to high-risk jurisdictions<sup>1</sup>. Therefore, the AMLO should analyze the remittance data to identify the sources, destinations, amounts, frequencies, and

purposes of the transactions, and compare them with the customer profiles, expected activities, and risk ratings. The AMLO should also review any relevant information from external sources, such as media reports, sanctions lists, or law

enforcement alerts, to determine if there are any red flags or indicators of suspicious activity. If the investigation reveals any evidence or suspicion of money laundering or terrorist financing, the AMLO should file a SAR/STR to the appropriate

AML authority.

References:

Remittances data - Migration data portal



## QUESTION 5

Which pattern of activity most strongly indicates an individual is a foreign terrorist fighter?

- A. A large purchase at a gas station immediately followed by several smaller purchases at an electronics store
- B. A large cash advance on a credit card and purchases at travel and sporting goods websites
- C. A series of small deposits followed by a large international wire to a well-known international charity
- D. A series of small cash deposits made in rapid succession totaling just over 10,000 USD followed by a purchase at a jewelry store

Correct Answer: B

The pattern of activity that most strongly indicates an individual is a foreign terrorist fighter is a large cash advance on a credit card and purchases at travel and sporting goods websites. This is because this pattern may suggest that the individual is preparing to travel to a conflict zone and purchase equipment or supplies for terrorist activities. According to the United Nations Office on Drugs and Crime, some of the indicators of foreign terrorist fighters include<sup>1</sup>:

Sudden or increased financial activity, such as cash withdrawals, transfers, or deposits, especially in large amounts or involving foreign currency or locations. Purchases of travel-related items, such as airline tickets, passports, visas, luggage, or clothing, especially to or from high-risk destinations or transit hubs. Purchases of items that could be used for terrorist purposes, such as weapons, explosives, chemicals, communication devices, or survival gear. Changes in behavior, such as expressing radical views, cutting ties with family or friends, joining extremist groups, or displaying signs of emotional distress.

References:

Foreign Terrorist Fighters - United Nations Office on Drugs and Crime

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