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**QUESTION 1**

What person or group is ultimately responsible for the institution's AML/CFT Program?

- A. The AML audit committee
- B. The AML/CFT Compliance Officer
- C. The Chief Executive Officer (CEO)
- D. The Board of Directors

Correct Answer: D

Reference: <https://www.sbp.org.pk/bprd/2020/C5-Annex.pdf> (13)

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**QUESTION 2**

One of the red flags of microstructuring is:

- A. depositing sequentially numbered checks.
- B. check deposits followed by ATM withdrawals using debt card in retail store.
- C. single activity in an account immediately following the opening of the account.
- D. frequent visits to make cash deposits of nominal amounts.

Correct Answer: D

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**QUESTION 3**

Which is a FATF characteristic used to assess a country's effectiveness of its AML regime?

- A. Funds supporting and proceeding from crime or terrorism are prevented from entering the financial sector.
- B. Legal persons are prevented from misuse for money laundering or terrorist financing.
- C. Supervisors appropriately supervise, monitor, and regulate financial institutions (FIs).
- D. FIs adequately apply preventive measures.

Correct Answer: A

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**QUESTION 4**

An automotive parts company in South America sends multiple \$500,000 wire transfers per week to ABC Holdings Ltd. in Asia referencing payment for silk flower shipments. Research reveals Sunrise Holdings, Ltd is registered in the British Virgin Islands with no available ownership information.

What are two red flags that indicate how trade-based money laundering could be occurring in this instance? (Choose two.)

- A. The transaction involves the use of front (or shell) companies
- B. The packaging is inconsistent with the commodity or shipping method
- C. Significant discrepancies appear between the description of the commodity on the bill of lading and the invoice
- D. The type of commodity being shipped appears inconsistent with the exporter or importer's regular business activities

Correct Answer: AC

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#### QUESTION 5

What are three potential issues for foreign financial institutions maintaining correspondent accounts with U.S. banks under the Patriot Act? Choose 3 answers

- A. Cancellation of correspondent banking relationships
- B. Forfeiture of funds in a U.S. interbank account
- C. Prohibition of correspondent accounts for shell banks
- D. U.S. residents maintaining private banking accounts

Correct Answer: ABC

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