



# FINANCIAL ANALYSIS UNIT OF PANAMÁ





**“FOR A STRONG, HEALTHY AND  
TRANSPARENT ECONOMY”**

**Panamá**  
Unidad de Análisis Financiero

# Final Beneficiary's General Information



## Personal Information:

Name: Mike Santos

Date of Birth: June 22, 1989

Age: 36 years old

Citizenship: Panamanian

Occupation: Independent Technology Advisor

Monthly income: \$3,000.00

## Credit Information:

Personal Loan (1) \$12,000.00

Credit Cards (4) \$8,500.00

## Patrimonial Wealth:

Not identified

## Related Companies:

4 companies incorporated between  
2021-2023

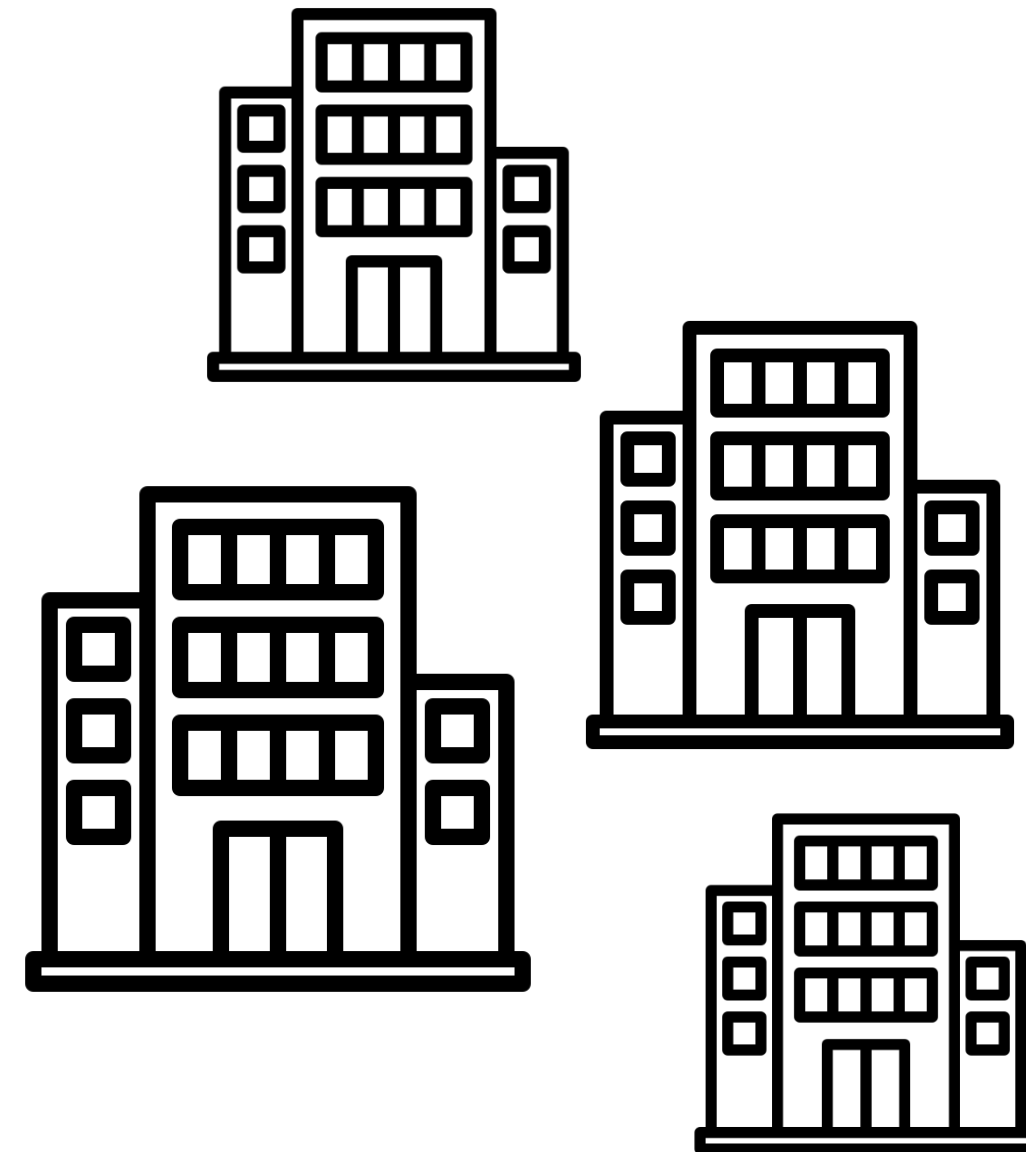
## Registered Automobiles:

2018 Toyota Corolla

## Identified Bank Accounts:

1 savings account in Bank A

1 checking account in Bank B



# Background:

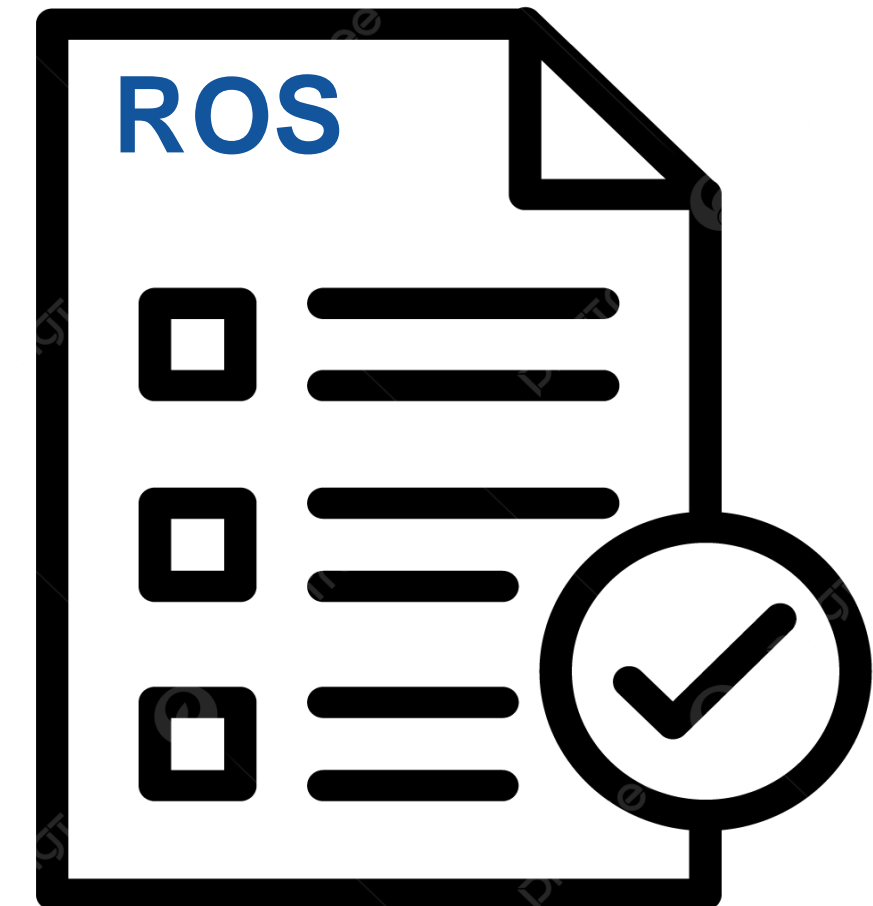
Bank A reports Corporation X, a provider of technological solutions, due to an incident involving a loan around the end of 2022. In that moment, Corporation X requested a \$235,000.00 commercial loan with a 10% annual interest rate over a 5-year term. As part of the agreement, the corporation X committed to carry out monthly payments of \$5,875.00.

During the first few months, Corporation X promptly complied with their financial obligations and paid the agreed monthly amount. However, payment non-compliance began on the fifth month.

As a result of this, Bank A tried contacting the client in order to understand the reasons behind the lack of payment and find a solution. Multiple attempts through phone call and email were made, but none were answered.

It's important to highlight that, when Corporation X was evaluated prior to the loan, it provided financial statements that proved the company's economic liquidity and apparent solid financial structure. In addition, the corporation met all the bank's requirements for the loan to be approved without any major inconvenience.

Despite initially complying with the loan's conditions, Corporation X allocated the entirety of the obtained funds to the final beneficiary in less than three months. The funds were diverted through various transactions done in several banks and using different companies established in Panama in which Mr. Mike Santos was also the final beneficiary. This behavior, which occurred in multiple occasions and with several financial institutions, raised suspicions with the bank given that the original debt remains unpaid and no communication with the corporation responsible has been achieved.

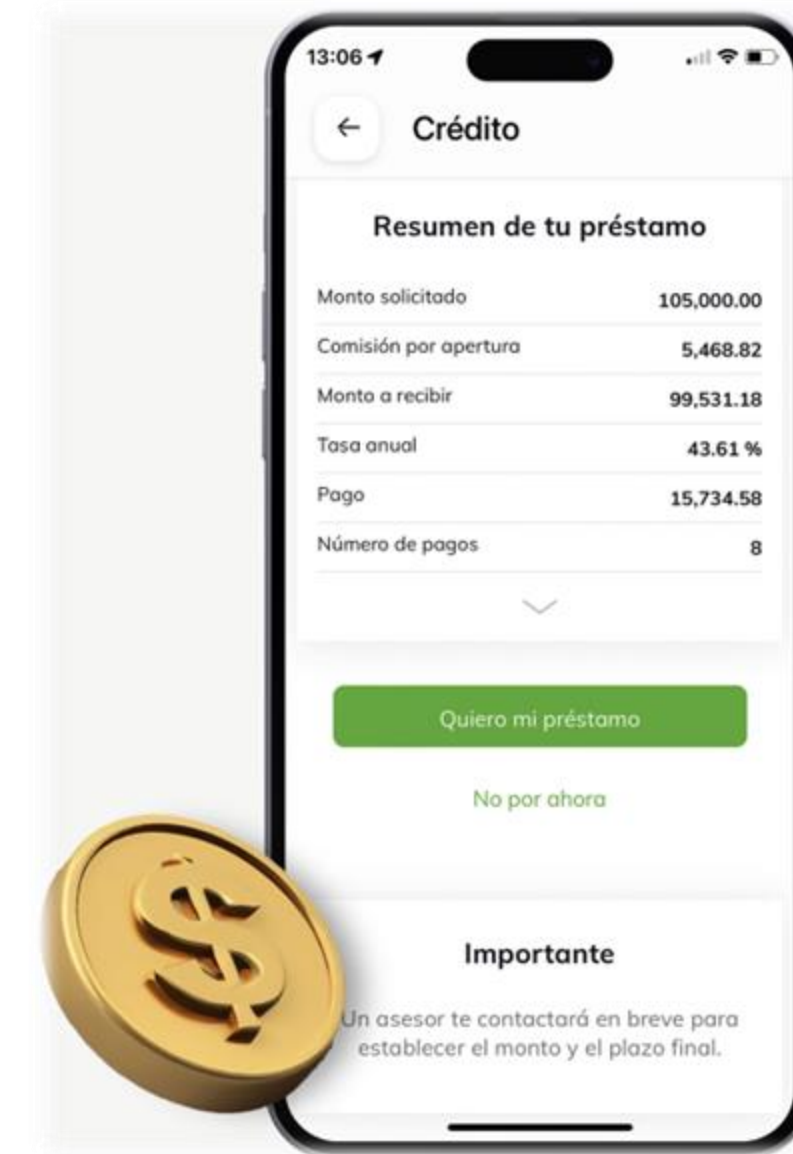


# How were the loans requested?:

Corporation X filled out the loan request online, attaching the required documents directly into the platform. Once their financial information was evaluated and their economic strength corroborated, the bank approved the loan in a few days,

Afterwards, their representative, “Mike Santos,” only had to go in person to sign the contract and hand in the physical copies of the documents. Less than 15 days after the initial request, the funds were deposited in Corporation X’s account.

In the request, Corporation X said the funds would be destined to the remodeling of their facilities; one of the reasons presented to justify the approval.





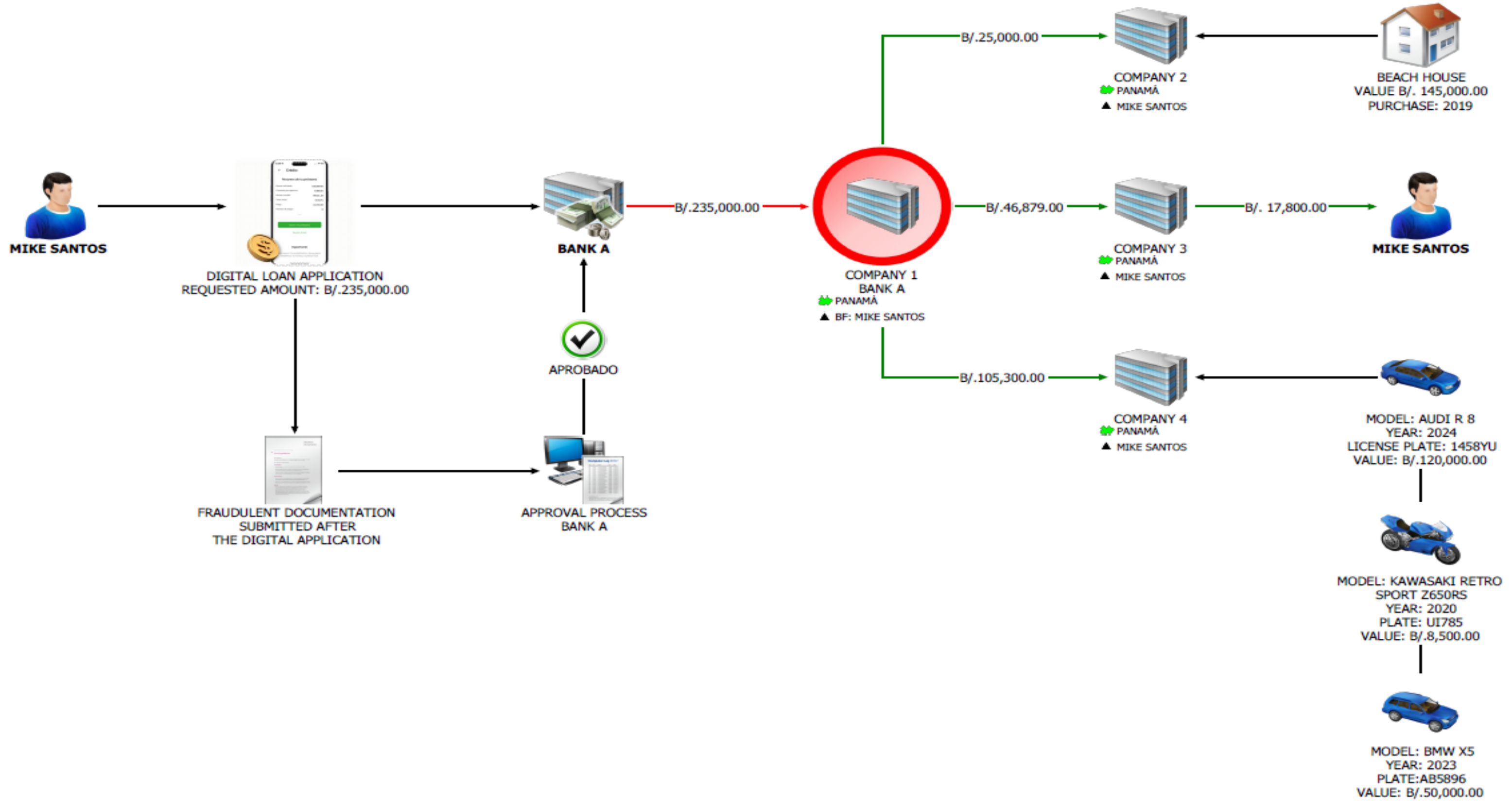
# Conclusion:

Following a thorough investigation, it was discovered Corporation X's legal representative, Mr. Mike, operated a carefully elaborated scheme. This scheme consisted in the creation of multiple Panamanian corporations which he structured in such a way they feigned legitimacy. To strengthen this alleged legitimacy, he would rent temporary premises which gave the impression of legal operations all while keeping carefully doctored financial statements to comply with banking requirements.

With the created corporations, Mr. Mike would request loans in various financial institutions, always using the same strategy: promptly complying with all initial payments to gain credibility, but stopping all payments without any explanation after a while. This repetitive and systematic pattern revealed a fraudulent scheme designed to obtain financial resources with no intention of ever honoring his compromise to the bank.

This case reveals a noticeable deficiency in the bank's processes, highlighting the lack of proper risk assessment procedure and lack of thorough credit background analysis. Despite the importance of these controls to guarantee solid financial decisions, the bank gave credit to a recently established company with no proven work history that allowed their payment capacity or operational sustainability to be evaluated. This proves a lack of effective oversight as well as negligence in the implementation of risk mitigation mechanisms which compromised the stability of the financial system and the bank's own reputation.







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