

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF BUSINESS REGULATION
DIVISION OF SECURITIES & DIVISION OF INSURANCE
1511 PONTIAC AVENUE, BUILDING 69
CRANSTON, RI 02920**

IN THE MATTER OF

ANTONIO P. DOS SANTOS

Respondent.

DBR No.

15-SC-003

15-IN-010

CONSENT AGREEMENT

It is hereby agreed between the Department of Business Regulation (“Department”) and Antonio P. Dos Santos (“Dos Santos” or “Respondent”) as follows:

1. Dos Santos is a licensed insurance producer within the State of Rhode Island.
2. Dos Santos held a broker dealer sales representative license with the State of Rhode Island from May 6, 2003 through May 3, 2005, but has not held a license to sell securities anywhere since May 5, 2005.
3. Dos Santos speaks Portuguese and was able to communicate with GetEasy Group either through contacts or directly because of this ability.
4. As a result of a consumer complaint, the Department investigated the sales of Get Easy memberships by several individuals in Rhode Island.
5. Pursuant to Sections 602 and 712 of the Rhode Island Uniform Securities Act of 1990 (“RIUSA”), § 7-11-101 *et seq.* of the Rhode Island General Laws, 1989, as amended, the Director of the Rhode Island Department of Business Regulation (“Director”) issued an Emergency Order to Cease and Desist; Notice of Opportunity for a Hearing (“Notice”) and

Notice of Intent to Impose Civil Penalty under Sections 602 and 712 of the RIUSA with regard to Respondent on October 5, 2015.

6. Pursuant to R.I.G.L. §§ 42-14-16, 42-35-9 and 27-2.4-1 *et seq.*, the Director issued an Order to Show Cause, Notice of Hearing and Appointment of Hearing Officer (“Order”) on December 1, 2015.

Other Relevant Parties

7. Timothy M. Kelly (“Kelly”) is an actively licensed insurance producer in Rhode Island and does business as Unique Financial Services. Kelly was subject to an Emergency Cease and Desist Order issued by the Director on September 16, 2015 relating to his sales of GetEasy Group Memberships.

8. Theodore E. Maranda (“Maranda”) is an actively licensed insurance producer in Rhode Island. Maranda was subject to an Emergency Cease and Desist Order issued by the Director on September 16, 2015 relating to his facilitation of sales of GetEasy Group Memberships.

9. GetEasy Group (“GetEasy”), a/k/a iGetEasy, a/k/a iGetMania was a Ponzi scheme that sold “GetEasy Memberships,” but marketed itself as a multi-level marketing group based in Europe. They operate a number of websites, including www.officegeteasy.com and <http://igetmania-way.eu/>. GetEasy was subject to an Emergency Cease and Desist Order issued by the Director on September 16, 2015 relating to its role in the sale of GetEasy memberships. GetEasy’s former CEO Tiago Fontoura was reported to have been arrested in Tunisia on criminal charges related to the GetEasy scheme.

Dos Santos’s Role

10. Dos Santos told his former colleague Maranda about the Get Easy investment by showing him an online video explaining how the GetEasy Membership. Maranda then introduced a

business partner of his Timothy Kelly (“Kelly”) to the “Get Easy membership.” Dos Santos also previously knew Kelly.

11. Dos Santos explained to Kelly and Maranda how to recruit and build their own sales teams and that the more sales they and their team made, the more points they would earn, which would lead to additional money for Kelly and Maranda.

12. Dos Santos gave Kelly and Maranda technical assistance with their GetEasy Membership sales, Dos Santos facilitated the transfer of Euros to Kelly and Maranda, and he encouraged Kelly and Maranda to sell additional GetEasy Memberships by explaining that additional sales would lead to “bonuses” (which could be converted into euros and eventually dollars).

13. When two consumers contacted Maranda with a problem logging into their GetEasy accounts in December 2014, Maranda contacted Dos Santos for assistance. When Maranda had a problem transferring Euros in a GetEasy account, Dos Santos came out and helped him with the computer work. And when Kelly had concerns about GetEasy, he asked Dos Santos to contact them through a contact or directly himself because Dos Santos could “talk to them in there [sic] language.”

14. Dos Santos was also the main conduit of funds flowing from Kelly and Maranda to GetEasy. In one instance, Complainant gave \$10,000 to Kelly to purchase two \$5,000 GetEasy memberships. Kelly deposited the dollars into his business account on October 29, 2014. On November 5 and 6, 2014, two checks were written from that account to “Antonio Dos Santos” for a combined \$5,000 which referenced both the Complainant and Victim GM and a number of Euros the payment was to be for in the memo line of the check. The checks payable to Dos Santos were both cashed, and some amount of funds were forwarded to GetEasy.

15. In another instance, on 6/16/2014 Consumer JP gave Kelly \$1,800 to purchase a GetEasy membership. On 6/16/2014 Kelly wrote a check to “Tony DosSantos” for \$1,712 which cleared on 6/17/2014. The check had a memo line referencing Consumer JP’s name. In exchange for the \$1,800, Kelly guaranteed Consumer JP \$75 per week for 48 weeks, effectively doubling his money.

16. In August, 2015, the Department received a complaint from a Rhode Island resident. The complaint alleged that Kelly sold “Get Easy memberships” to the Complainant, and that the Complainant lost \$10,000 as a result.

17. Kelly and Maranda sold over a dozen “Get Easy memberships” to other Rhode Island residents. Each of those individuals lost money, and over \$50,000 was lost in investments in “Get Easy memberships.”

18. Dos Santos knew or should have known that the GetEasy investment scheme was a fraud. Dos Santos has been working in the Financial Services field since 1993 and had enough experience in the securities field in general that he knew, or should have known, that GetEasy’s claims to double your money within 48-weeks was a scam.

19. The guaranteed investment promised by the GetEasy Memberships was not real, and Respondent Dos Santos knew or should have known that it was not real.

20. Get Easy memberships are a security under Rhode Island General Laws § 7-11-101(22), Get Easy memberships were neither registered under R.I.G.L. §7-11-301 *et seq.* nor were they exempt from registration thereunder.

21. Dos Santos did offer and sell a Get Easy membership, and he aided and abetted the sale of other Get Easy memberships by Kelly and Maranda.

22. Dos Santos was not licensed as either a broker dealer or a broker dealer sales representative when he introduced Maranda to the Get Easy membership for profit and when he facilitated the sale of other Get Easy memberships by Kelly and Maranda for his own financial gain.

23. Respondent Dos Santos perpetrated a fraudulent investment scheme by soliciting Maranda, by accepting monies from Kelly and Maranda, and by engaging in acts, practices and a course of business that would operate and did operate as a fraud or deceit on other Rhode Island residents. Respondent Dos Santos was either aware of the fact that GetEasy was a fraudulent scheme, or should have known that GetEasy was a fraudulent scheme.

24. Dos Santos contends that he was unaware that the Get Easy scheme was a Ponzi scheme and that he understood it to be a legal multi-level marketing scheme. He understands now that that it was a Ponzi scheme, and Dos Santos lost some of his own money in the scheme too.

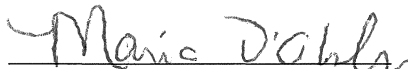
THEREFORE, based on the foregoing, Respondent and the Department have decided to resolve this matter without further administrative proceedings and hereby agree to the following resolution:

- 1) Respondent will pay a \$5,000 fine to the Department within 7-days of executing this agreement;
- 2) Respondent agrees to the revocation of his insurance license;
- 3) Respondent agrees to not reapply for another insurance license for 5-years;
- 4) Respondent agrees to be permanently barred by the Securities Division in any capacity;

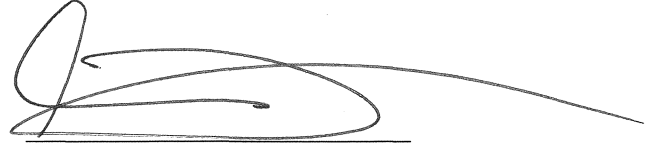
5) Respondent agrees that the Cease and Desist Order entered by the Director on October 5, 2015 shall become permanent.

The Department and Respondent hereby consent and agree to the foregoing on their own behalf and on behalf of the Department on this 28th day of January, 2016.

Department of Business Regulation
For the Securities Division

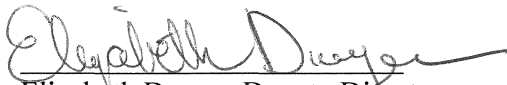

Maria D'Alessandro, Deputy Director

Antonio Dos Santos



This 25th Date of January 2016

For the Insurance Division


Elizabeth Dwyer, Deputy Director