IAPD Report

DEVIN MATTHEW LARKINS

CRD# 4930349

IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page http://www.nasaa.org/IAPD/IARReports.cfm

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association http://www.nasaa.org

Report Summary

DEVIN MATTHEW LARKINS (CRD# 4930349)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **02/13/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	SIMPLICITY WEALTH	CRD# 300572	02/13/2025

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **3** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.
Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	LIFEPRO ASSET MANAGEMENT	285252	Draper, UT	06/08/2017 - 02/14/2025
IA	LARKINS INVESTMENT MANAGEMENT, LLC	159751	DRAPER, UT	08/21/2012 - 06/21/2017
B	FIDELITY BROKERAGE SERVICES LLC	7784	SALT LAKE CITY, UT	08/01/2005 - 01/19/2007

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	2

Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works.
This individual is currently registered with **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **SIMPLICITY WEALTH**

Main Address: 475 SPRINGFIELD AVE.
SUITE #1
SUMMIT, NJ 07901

Firm ID#: 300572

	Regulator	Registration	Status	Date
IA	California	Investment Adviser Representative	Approved	02/14/2025
IA	Texas	Investment Adviser Representative	Restricted Approval	02/13/2025
IA	Utah	Investment Adviser Representative	Approved	02/19/2025

Branch Office Locations

SIMPLICITY WEALTH
Draper, UT

Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 0 principal/supervisory exams, 1 general industry/product exam, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	General Securities Representative Examination (S7)	Series 7	07/01/2005

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	05/18/2011
B	Uniform Securities Agent State Law Examination (S63)	Series 63	07/08/2005

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.

Only professional designations listed in Question 8 of the Form U4 will appear in this section if the appropriate box is checked and verified by the issuing organization at the time of the filing. Learn more about eligible designations at IARD and NASAA.

Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	06/08/2017 - 02/14/2025	LIFEPRO ASSET MANAGEMENT	CRD# 285252	Draper, UT
IA	08/21/2012 - 06/21/2017	LARKINS INVESTMENT MANAGEMENT, LLC	CRD# 159751	DRAPER, UT
B	08/01/2005 - 01/19/2007	FIDELITY BROKERAGE SERVICES LLC	CRD# 7784	SALT LAKE CITY, UT

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
02/2025 - Present	Simplicity Wealth	Investment Adviser Representative	Y	Summit, NJ, United States
03/2008 - Present	STRATEGIC DESIGN, INC	PRESIDENT	N	DRAPER, UT, United States
06/2017 - 02/2025	LifePro Asset Management	Investment Adviser representative	Y	San Diego, CA, United States
11/2011 - 06/2017	LARKINS INVESTMENT MANAGEMENT, LLC	SOLE MANAGER	Y	DRAPER, UT, United States
03/2008 - 06/2017	Gradient Insurance	Manager	Y	Draper, UT, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

STRATEGIC DESIGN, INC, Non-investment related, DRAPER, UT, Start Date: 03/2008, PRESIDENT. Nature of business is financial planning and investments, all securities business conducted through LifePro as an IAR. Approximately 160 hours per month. No longer licensed as an insurance producer nor commission based business.

Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least $5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending, on appeal,* or *final*.
  - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
  - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
  - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated, settled* or *otherwise resolved*.
  - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
  - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
  - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.

DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	2

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	Utah
Sanction(s) Sought:	Bar Cease and Desist Civil and Administrative Penalty(ies)/Fine(s) Revocation
Date Initiated:	12/09/2020
Docket/Case Number:	SD-20-0039
URL for Regulatory Action:	https://db.securities.utah.gov/dockets/20003902.pdf
Employing firm when activity occurred which led to the regulatory action:	Larkins Investment Management, LLC, IARD#159751
Product Type:	Investment Contract
Allegations:	The Division alleged Respondent violated Sections 61-1-3(1) and 61-1-7 of the Utah Uniform Securities Act.
Current Status:	Final
Resolution:	Stipulation and Consent

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	11/01/2021
Sanctions Ordered:	Cease and Desist Civil and Administrative Penalty(ies)/Fine(s) Other: Respondent shall not sell any future direct participation program investments in or from Utah and shall send all current advisory clients a copy of the updated ADV Part 2B document reflecting the disclosure of this action within thirty (30) days of entry of the Consent Order.
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$60,000.00
Portion Levied against individual:	$60,000.00
Payment Plan:	
Is Payment Plan Current:	Yes
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Regulator Statement	In resolving this matter, Larkins admitted to acting as an unlicensed agent under Section 61-1-3(1) of the Act and selling unregistered securities under Section 61-1-7 of the Act. The Stipulation and Consent Order may be viewed at: https://db.securities.utah.gov/dockets/20003931.pdf

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Reporting Source:	Individual
Regulatory Action Initiated By:	Utah Division Of Securities
Sanction(s) Sought:	Bar Monetary Penalty other than Fines Revocation
Date Initiated:	12/21/2020
Docket/Case Number:	SD-20-0039
Employing firm when activity occurred which led to the regulatory action:	Larkins Investment Management, LLC
Product Type:	Insurance Other: Unregistered Security
Allegations:	The Utah Division of Securities has filed an Amended Petition (Docket No. SD-20-0039) to the Utah Securities Commission. The amended petition has been filed related the following allegations against Mr. Larkins - Securities Fraud under

	Section 61-1-1(2) of the Act, Securities Fraud under Section 61-1-1(3) of the Act, Unlicensed Agent under Section 61-1-3(1) of the Act, Sale of Unregistered Securities under Section 61-1-7 of the Act, False Statements to the Division under Section 61-1-16 of the Act, Dishonest or Unethical Practices under Section 61-1-6(2)(a)(ii)(G) of the Act. This petition is pending final decision with the Utah Securities Commission. Mr. Larkins strongly denies the allegations and intends to contest the Petition."
Current Status:	Final
Resolution:	Order
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	10/27/2021
Sanctions Ordered:	Cease and Desist Monetary Penalty other than Fines Other: Respondent agrees to the following actions as relates to business conducted in Utah: (a) Mr, Larkins shall not sell any future direct participation program investment in or from the State of Utah; and (b) Larkins shall send all current advisory clients a copy of the updated ADV Part 2B document reflecting the disclosure of this action within (30) days of the entry of the order.
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Monetary Penalty other than Fines
Total Amount:	$60,000.00
Portion Levied against individual:	$60,000.00
Payment Plan:	1st payment of $20,000 within ten days of the entry and then 8 quarterly payments of $5,000 starting on or before 3/31/2022
Is Payment Plan Current:	Yes
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	

Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 2

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	Larkins Investment Management , LLC
Allegations:	Mr. Larkins was named as part of a receiver action for activities performed while an investment adviser representative of his former advisory firm (Larkins Investment Management, LLC) and as an insurance agent under Paramount Financial Services, Inc. d/b/a Live Abundant in connection with the sale of Future Income Payments LLC ("FIP") products to clients in 2013-2015. The complaint alleges Mr. Larkins had either failed to perform proper due diligence to discover, or had knowledge of and failed to disclose, ongoing state and federal investigations associated with FIP products - and those persons promulgating such products, which were later revealed to be operating as a Ponzi scheme.
Product Type:	Other: Unregistered Securities
Alleged Damages:	$108,228.53

Civil Litigation Information

Type of Court:	Federal Court
Name of Court:	United States District Court
Location of Court:	South Carolina Greenville Division
Docket/Case #:	6:20-cv-1112-BHH
Date Notice/Process Served:	04/22/2020
Litigation Pending?	No
Disposition:	Settled
Disposition Date:	08/05/2021
Monetary Compensation Amount:	$27,000.00
Individual Contribution Amount:	$27,000.00
Broker Statement	Mr. Larkins disputes the claims in the FIP Receiver's action. When Mr. Larkins first learned about the structured cash flow product offered by FIP, he conducted thorough due diligence on the product before offering it to any of his clients. He was reassured by multiple people who had been involved with FIP for years that the company had an excellent track record, and his own research confirmed those opinions. He was also reassured by multiple agents who had sold the product and by those involved in offering the product that it was not a security. He had no way of knowing at the time of the sales that FIP was operating as a Ponzi scheme or that FIP would misappropriate the client money that it received. On August 5, 2021, Devin Larkins entered into a full and final settlement and satisfaction of all of the Receiver's claims and demands relating to or arising out of his Future Income

Payments, LLC ("FIP"). Mr. Larkins agreed to pay the Receiver the total sum of $27,000.

Disclosure 2 of 2

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	Larkins Investment Management , LLC
Allegations:	Claimant alleges that indexed universal life insurance policy purchased in December 2014 was misrepresented and unsuitable, and seeks remedy.
Product Type:	Insurance
Alleged Damages:	$5,000.00
Alleged Damages Amount Explanation (if amount not exact):	Damages unspecified but reasonably believed to be greater than $5,000.

Civil Litigation Information

Type of Court:	State Court
Name of Court:	THIRD JUDICIAL DISTRICT COURT - STATE OF UTAH
Location of Court:	SALT LAKE COUNTY
Docket/Case #:	200901048
Date Notice/Process Served:	02/06/2020
Litigation Pending?	Yes

End of Report

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