



**Form ADV Part 2B – Individual Disclosure Brochure**

**Vincent J. Palumbos**

Investment Adviser Representative  
CRD #3220021

Novem Group  
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*This document provides information about Vincent J. Palumbos that supplements the Novem Group Firm Brochure, which you should have received a copy of. Please contact Amanda R. Esteves, Chief Compliance Officer of Novem Group, if you did not receive a copy of the Firm Brochure or if you have any questions on the contents of this document. Additional information on Vincent J. Palumbos is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**Personal Information**

Name: Vincent J. Palumbos

Born: 1944

Education: Cambridge College, 1987  
Master of Education

**Business Background (past 5 years)**

|                   |   |
|-------------------|---|
| 11/2017 – Present | Investment Adviser Representative<br>Novem Group                          |
| 8/2016 – Present  | Investment Adviser Representative<br>American Portfolios Advisors, Inc.   |
| 8/2016 – Present  | Registered Representative<br>American Portfolios Financial Services, Inc. |
| 7/2004 – 8/2016   | Registered Representative<br>Wall Street Financial Group                  |

**Certifications**

|           |  |
|-----------|--|
| SIE       | Securities Industry Essentials Examination     |
| Series 7  | General Securities Representative Examination  |
| Series 24 | General Securities Principal Examination       |
| Series 63 | Uniform Securities Agent State Law Examination |
| Series 65 | Uniform Investment Adviser Law Examination     |

**Other Business Activities**

Vincent J. Palumbos is a Registered Representative of American Portfolios Financial Services, Inc., an Investment Adviser Representative of American Portfolios Advisors, Inc., and a licensed Insurance Agent. From time to time, the representative may offer clients advice or products from these activities. Clients should be aware that these services may pay a commission and may involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of an Investment Adviser Representative. Novem Group always acts in the best interest of the client including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any Investment Adviser Representative of Novem Group in their capacity as a Registered Representative or licensed Insurance Agent.

Vincent J. Palumbos is Pilot and Safety Officer with the Civil Air Patrol.

**Additional Compensation**

Vincent J. Palumbos does not receive any economic benefit from any person, company, or organization, other than Novem Group, in exchange for providing clients advisory services through Novem Group.

**Supervision**

As an Investment Adviser Representative, Vincent J. Palumbos works closely with their supervisor and all advice provided to clients and account-related transactions are reviewed by their supervisor. Vincent J. Palumbos adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's Written Supervisory Procedures and Code of Ethics and regulatory requirements.

**Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this representative's business.