



Form ADV Part 2B – Individual Disclosure Brochure

Thomas C. Froehlich

Investment Adviser Representative
CRD #1635098

Novem Group
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Updated: 8/17/2021

This document provides information about Thomas C. Froehlich 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 Thomas C. Froehlich is available on the SEC's website at www.adviserinfo.sec.gov.

Personal Information

Name: Thomas C. Froehlich

Born: 1957

Business Background (past 5 years)

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| 7/2020 – Present | Investment Adviser Representative Novem Group |
| 3/2007 – Present | Investment Adviser Representative American Portfolios Advisors, Inc. |
| 5/2005 – Present | Registered Representative & Registered Principal American Portfolios Financial Services, Inc. |
| 1/1997 – 11/2020 | Owner and Principal Froehlich Financial Group, LTD |

Certifications

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

Thomas C. Froehlich is a Registered Representative and Registered Principal of American Portfolios Financial Services, Inc. and an Investment Adviser Representative of American Portfolios Advisors, Inc. 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 Investment Adviser Representative of another firm.

Thomas C. Froehlich is a board member of the American Cancer Society. He also outsources group health insurance and P&C insurance services.

Additional Compensation

Thomas C. Froehlich 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, Thomas C. Froehlich works closely with their supervisor and all advice provided to clients and account-related transactions are reviewed by their supervisor. Thomas C. Froehlich 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

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| Reporting Source: | Regulator |
| Regulatory Action Initiated By: | State of Wisconsin Securities Commissioner |
| Date Initiated: | 3/9/1995 |
| Product Type: | No product |
| Allegations: | Failure to pay licensing fee |
| Current Status: | Final |
| Resolution: | Decision |
| Resolution Date: | 3/9/1995 |
| Sanctions Ordered: | Suspension |
| Broker Statement: | Wisconsin securities agent license was suspended on 3/9/95 for non-payment of the required \$30 fee when the agent transferred to another Broker-Dealer. The fee was paid on 4/10/95 and the suspension was lifted. |