



Form ADV Part 2B – Individual Disclosure Brochure

Vincent J. Palumbos

Investment Adviser Representative
CRD #3220021

Novem Group
350 Linden Oaks, Suite 140
Rochester, NY 14625
585-348-9423
vpalumbos@novemgroup.com

Updated: 01/12/2024

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.

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
Novem Group

8/2016 – Present Investment Adviser Representative
American Portfolios Advisors, Inc.

8/2016 – Present Registered Representative
American Portfolios Financial Services, Inc.

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 also a 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.