



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

**Thomas C. Froehlich**

Investment Adviser Representative  
CRD #1635098

Novem Group  
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*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](http://www.adviserinfo.sec.gov).*

**Personal Information**

Name: Thomas C. Froehlich

Born: 1957

**Business Background (past 5 years)**

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 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**

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.