



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. Abdoo, 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
Masters 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.
7/2004 – 8/2016	Registered Representative Wall Street Financial Group

Certifications

Series 7	General Securities Representative Exam
Series 24	General Securities Principal Exam
Series 63	Uniform Securities Agent State Law Exam
Series 65	Uniform Investment Adviser Law Exam

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. He is also a facilitator at Matt Talbot Ministries.

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 his supervisor and all advice provided to clients and account-related transactions are reviewed by his 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 manual, including the 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.