



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

**Kris E. Tower**

Investment Adviser Representative  
CRD #2765979

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*This document provides information about Kris E. Tower 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 Kris E. Tower is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## Personal Information

Name: Kris E. Tower

Born: 1972

Education: University of Wyoming  
Bachelor of Science in Business Administration, 1996

## Business Background (past 5 years)

1/2015 – Present Investment Adviser Representative  
Novem Group

2/2006 – Present OSJ & Registered Representative  
American Portfolios Financial Services, Inc.

2/2006 – Present Investment Adviser Representative  
American Portfolios Advisors, Inc.

## Certifications

Series 7 General Securities Representative Exam

Series 9 General Securities Sales Supervisor – Options Module Examination

Series 10 General Securities Sales Supervisor – General Module Examination

Series 24 General Securities Principal Examination

Series 52 Municipal Securities Representative Examination

Series 63 Uniform Securities Agent State Law Examination

Series 65 Uniform Investment Adviser Law Exam

## Designations

### CFP® - Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- i. Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- ii. Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.**

### **AIF® - Accredited Investment Fiduciary**

Advisors who have earned the Accredited Investment Fiduciary designation are able to immediately show that they are interested in and working towards the best interests of their clients. They have gone through training, met the qualifications, and passed the exam allowing use of the AIF® designation.

#### Qualifications:

There are four requirements for attaining the AIF® designation:

1. Enroll in and complete the AIF® Training
2. Pass the AIF® Examination

The examination is a computer-based, timed, closed-book assessment that must be attempted unaided in the presence of a proctor. The designation examinations consist of:

- AIF® examination consists of sixty (60) multiple choice questions with a time-limit of ninety (90) minutes. A paper-based examination is available upon prior arrangement by Fi360 or the exam taker, and may only be proctored by Fi360 personnel.

3. Meet the experience requirement

One of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry.

- Minimum of two (2) years of relevant experience; a bachelor’s degree (or higher); and a professional credential.
- Minimum of five (5) years of relevant experience; a bachelor’s degree (or higher) or a professional credential.
- Minimum of eight (8) years of relevant experience.

4. Submit the application and dues

Included in the application are sections to attest to both the Code of Ethics and Conduct Standards. The Code of Ethics consists of the tenets of ethical conduct expected of all credential holders, while the Conducts Standards pertain to any past criminal and civil litigation, regulatory events, and personal and professional conduct.

#### Continuing Education Requirement:

AIF® designees must accrue a minimum of six hours of continuing education annually. The CE requirement is effective immediately upon attainment of the AIF® designation, and CE hours may be accrued from a variety of sources. All CE is subject to audit by, and final approval from, Fi360.

**Other Business Activities**

Kris E. Tower is a Registered Principal and 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.

Kris E. Tower engages in fixed insurance sales through and is the President of AP Denver, Inc. He is also an expert witness on behalf of AP Denver, Inc.

Kris E. Tower is a member on the Advisory Council, the Legislative and Regulatory Issues Committee, the OneFPA Advisory Council, and the Executive Committee of the National Financial Planning Association, and devotes 4 hours per month during market hours and 10 total hours per month.

**Additional Compensation**

Kris E. Tower 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, Kris E. Tower works closely with their supervisor and all advice provided to clients and account-related transactions are reviewed by their supervisor. Kris E. Tower 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.