



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

**Andrew L. Gentile**

Investment Adviser Representative  
CRD #1199626

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

## Personal Information

Name: Andrew L. Gentile

Born: 1961

Education: Fordham University  
Bachelor of Arts in Economics, 1983

## Business Background (past 5 years)

5/2019 – Present	Investment Adviser Representative Novem Group
5/2019 – Present	Registered Representative American Portfolios Financial Services, Inc.
3/2010 – 4/2019	Registered Representative The Leaders Group, Inc.
2/2010 – 4/2019	Investment Adviser Representative TLG Advisors, Inc.

## Certifications

SIE	Securities Industry Essentials Exam
Series 6	Investment Company Products/Variable Contracts Representative Exam
Series 7	General Securities Representative Exam
Series 22	Direct Participation Programs Representative Exam
Series 24	General Securities Principal Exam
Series 51	Municipal Fund Securities Principal Exam
Series 63	Uniform Securities Agent State Law Exam
Series 65	Uniform Investment Adviser Law Exam

## Designations

### ChFC® – Chartered Financial Consultant

The ChFC® designation is offered by The American College of Financial Services.

To receive the ChFC® designation, an individual must successfully complete all courses and exams, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures. Participation in the Professional Recertification Program is also required.

### 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 62,000 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, administered in 10 hours over a two-day period, 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.**

### **Other Business Activities**

Andrew L. Gentile is a Registered Representative of American Portfolios Financial Services, Inc., and a licensed Insurance Agent, placing insurance and annuity business through Millenium Brokerage Group and Pinnacle Insurance. 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.

Andrew L. Gentile is the owner of Fair Share Divorce Solutions, a divorce consulting business.

### **Additional Compensation**

Andrew L. Gentile 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, Andrew L. Gentile works closely with their supervisor and all advice provided to clients and account-related transactions are reviewed by their supervisor. Andrew L. Gentile 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

### Regulatory – Final (1 of 1)

Reporting Source: Broker  
Regulatory Action Initiated By: Florida Office of Financial Regulation  
Sanction(s) Sought: Cease and Desist; Denial  
Date Initiated: 4/10/2019  
Docket/Case Number: 92741-SR  
Employing firm when activity occurred which led to the regulatory action:  
TLG Advisors, Inc.  
Product Type: No Product  
Allegations: Failure to disclose a reportable event on the U4 when applying for a Florida investment advisor registration  
Current Status: Final  
Resolution: Order  
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?  
No  
Resolution Date: 4/10/2019  
Sanctions Ordered: Cease and Desist; Denial  
Broker Statement: Due to an administrative error on my part, I did not disclose my felony arrest. I was given incorrect information from my former broker-dealer's chief compliance officer. After denial, I immediately disclosed the event as required on my U4 and I was permitted to reapply for my Florida investment advisor registration.

### Criminal – Final Disposition (1 of 1)

Reporting Source: Broker  
Formal Charges were brought in:  
State Court  
Name of Court: Gwinnet County  
Location of Court: Lawrenceville, GA  
Docket/Case #: 2018D-03389-1  
Charge Date: 8/28/2017  
Formal Charge/Description: Criminal Damage to Property  
No of Counts: 1  
Felony or Misdemeanor: Felony  
Plea for each charge: None – Trial Diversion  
Disposition of charge: Reduced  
Date of Amended Charge: 4/11/2018  
Charge was Amended or reduced to:  
Misdemeanor – Criminal damage to property in second degree  
Amended No of Counts: 1  
Amended Plea: None – Trial Diversion  
Disposition of Amended Charge:  
Pre-trial Intervention  
Current Status: Final

Status Date:	9/10/2018
Disposition Date:	9/10/2018
Sentence/Penalty:	Pre-trial diversion
Broker Statement:	My wife and I were arguing over a cell phone and whose was it. A stranger witnessed the situation and called the police. The phone's screen broke, and I was charged with a felony for criminal damage to property because the phone was valued over \$500.00. I should have not been charged with any offenses as I owned the phone and it cost \$115.00 to repair. The charge was dropped to a misdemeanor and was expunged from my record. It was an unfortunate situation which resulted in me having to report it on my U4.

#### **Financial – Final (1 of 1)**

Reporting Source:	Broker
Action Type:	Compromise
Action Date:	5/1/2018
Action Pending?	No
Disposition:	Discharged
Disposition Date:	8/28/2017
Name of Creditor:	SPS Mortgage
Original Amount Owed:	\$1,140,000.00
Terms Reached with Creditor:	None
Broker Statement:	An unwanted divorce led to a forced sale of the home and the mortgage was greater than the home value and we were forced to foreclose. We had previously used \$500,000 of the equity to pay for my wife's chronic disease treatments which were not covered by our insurance. In addition, the home was valued at \$1,700,000 in 2006, \$850,000 in 2009 and was sold by Bank for 884,000. The large home market in Atlanta never recovered.