



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

**Mark P. Gatti**

Investment Adviser Representative  
CRD #1027529

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Updated: 11/16/2022

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

## Personal Information

Name: Mark P. Gatti

Born: 1956

Education: Fitchburg State University  
Bachelor of Science in Education, 1978

## Business Background

11/2020 – Present Investment Adviser Representative  
Novem Group

1/2002 – Present Registered Representative  
American Portfolios Financial Services, Inc.

1/1986 – Present Owner & Agent  
Mark Gatti DBA T&FM Group

2/2002 – 5/2021 Investment Adviser Representative  
American Portfolios Advisors, Inc.

## Certifications

Series 6 – Investment Company Products/Variable Contracts Representative Examination  
Series 7 – General Securities Representative Examination  
Series 63 – Uniformed Securities Agent State Law Examination

## 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.**

### **Other Business Activities**

Mark P. Gatti is a Registered Representative of American Portfolios Financial Services, 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.

Mark P. Gatti also offers tax preparation services through his own business, and is an Enrolled Agent, which is an IRS designation allowing representation of clients.

### **Additional Compensation**

Mark P. Gatti 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, Mark P. Gatti works closely with their supervisor and all advice provided to clients and account-related transactions are reviewed by their supervisor. Mark P. Gatti 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.