



Form ADV Part 3 – Customer Relationship Summary

Introduction

This Customer Relationship Summary (CRS) was last updated on March 24, 2025 by Novem Group, an SEC-Registered Investment Adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. **Please refer to investor.gov/CRS for access to free and simple tools to research firms and financial professionals and educational materials about investing.**

What investment services and advice can you provide me?

Novem Group and its representatives offer investment advisory services to retail investors, and these services include financial planning, portfolio management, pension consulting, selection of other advisers, publication newsletters, education seminars and workshops, and wrap fee programs. As part of our standard services, account activity is monitored on a regular basis and current investments are compared with client suitability. Your financial professional is required to offer a review of your portfolio at least annually. Discretionary trading authority is authorized by the client within their contract and allows the financial professional or investment manager to enter transactions without first obtaining your approval. There is no minimum dollar amount required to open an account with Novem Group; however, there are minimum dollar amounts required to invest in Novem Group's managed portfolios.

Please use the following conversation starters with your financial professional:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

What fees will I pay?

An advisory client may be charged a flat fee percentage, or a tiered fee schedule, based on the value of your account or portfolio, or an hourly or fixed rate for services such as financial planning. Typically, fees are assessed on a quarterly basis in advance or in arrears and debited from the client's custodial account. Our firm sponsors a wrap fee program, which means the investor pays one fee that includes management fees and transaction costs; therefore, this fee may be higher than an advisory fee on a non-wrap account. Depending on the custodian, you may pay additional fees for transactions, account maintenance, transfer and closure, and paper statements. Certain investments and products charge internal fees. Financial professionals may direct clients to third party managers and the firm will be compensated via a fee share. Please refer to Items 4 and 5 in the [Novem Group ADV Part 2A Firm Brochure](#) for additional details. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Please use the following conversation starter with your financial professional:

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations when acting as my Investment Adviser?**How else does your firm make money and what conflicts of interest do you have?**

When Novem Group acts as your Investment Adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts. You should ask about these conflicts because they can affect the investment advice provided to you. Please refer to the next section regarding additional affiliations and the potential conflicts of interest that may relate to your financial professional.

Please use the following conversation starter with your financial professional:

- *How might your conflicts of interest affect me and how will you address them?*

How do Novem Group's financial professionals make money?

Financial professionals receive cash compensation from Novem Group based on the fees assessed on assets under management and products sold. Representatives of Novem Group may also be affiliated with Osaic Wealth, Inc. and Osaic Advisory Services, LLC. These activities involve a conflict of interest as commissionable products can conflict with the fiduciary duties of an Investment Adviser Representative. [Please click here to select and download your financial professional's Form ADV Part 2B Individual Disclosure Brochure for more information.](#)

Do you or your financial professionals have legal or disciplinary history?

Yes, there are financial professionals of Novem Group that currently have disclosure events and disciplinary information. Please refer to [Novem Group's ADV Part 2A Firm Brochure](#) and [your financial professional's ADV Part 2B Individual Disclosure Brochure](#) for more information. **Please visit investor.gov/CRS and [SEC IAPD](#) to research Novem Group and its financial professionals.**

Please use the following conversation starters to begin a dialogue with your representative:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information

You can find additional information on our firm's investment advisory services at www.novemgroup.com. Please feel free to contact Robert Bartolotta, Chief Executive Officer of Novem Group, at rbartolotta@novemgroup.com or 585-348-9521 if you would like to request more information.

Please use the following conversation starters with your financial professional:

- *Who is my primary contact person? Are they a representative of an Investment Adviser and/or a broker/dealer? Who can I talk to if I have concerns about how this individual is treating me?*