



IAPD Report

RONALD JOSEPH BENEVENTO

CRD# 2841848

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 3
Registration and Employment History	4
Disclosure Information	5

i When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.
Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

RONALD JOSEPH BENEVENTO (CRD# 2841848)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **05/20/2026**.

CURRENT EMPLOYERS

This individual is not currently registered as an Investment Adviser Representative.

QUALIFICATIONS

This individual is not currently registered as an Investment Adviser Representative.

Note: Not all jurisdictions require IAR registration or may have an exemption from registration. Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	CLUTCH CAPITAL MANAGEMENT, LLC	154533	FRANKLIN SQUARE, NY	06/04/2021 - 05/20/2026
IA	PROFESSIONAL PLANNING SERVICES	152702	HOLBROOK, NY	12/08/2010 - 03/11/2015
IA	AMERICAN PORTFOLIOS ADVISORS, INC	112697	HOLBROOK, NY	03/31/2010 - 12/31/2010

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	2



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is not currently registered as an Investment Adviser Representative.



Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 0 principal/supervisory exams, 0 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
------	----------	------

No information reported.

General Industry/Product Exams

Exam	Category	Date
------	----------	------

No information reported.

State Securities Law Exams

Exam	Category	Date
------	----------	------

IA Uniform Investment Adviser Law Examination (S65)	Series 65	09/15/2016
------------------------------------------------------------	-----------	------------

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	06/04/2021 - 05/20/2026	CLUTCH CAPITAL MANAGEMENT, LLC	CRD# 154533	FRANKLIN SQUARE, NY
IA	12/08/2010 - 03/11/2015	PROFESSIONAL PLANNING SERVICES	CRD# 152702	HOLBROOK, NY
IA	03/31/2010 - 12/31/2010	AMERICAN PORTFOLIOS ADVISORS, INC	CRD# 112697	HOLBROOK, NY
IA	06/08/2009 - 02/22/2010	AXA ADVISORS, LLC	CRD# 6627	MELVILLE, NY

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
10/2016 - Present	Clutch Capital Management, LLC	Investment Advisor Representative	Y	Rego Park, NY, United States
03/2015 - 10/2016	UNEMPLOYED	N/A	N	FRANKLIN SQ, NY, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

No information reported.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	2

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	08/04/2015
Docket/Case Number:	2013035369501
Employing firm when activity occurred which led to the regulatory action:	AMERICAN PORTFOLIOS FINANCIAL SERVICES, INC.
Product Type:	Mutual Fund

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, BENEVENTO CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT HE RECOMMENDED MUTUAL FUND SWITCH TRANSACTIONS IN CUSTOMER ACCOUNTS WITHOUT HAVING REASONABLE GROUNDS FOR BELIEVING THAT SUCH TRANSACTIONS WERE SUITABLE FOR THOSE CUSTOMERS IN LIGHT OF THE NATURE OF THE RECOMMENDED TRANSACTIONS, THE FREQUENCY OF THE TRANSACTIONS, AND THE TRANSACTION COSTS INCURRED. THE FINDINGS STATED THAT IN CONNECTION WITH THOSE SWITCH TRANSACTIONS, ALL OF WHICH INVOLVED THE PURCHASE AND SALE OF CLASS A MUTUAL FUND SHARES THAT HAD FRONT-END SALES LOADS, BENEVENTO'S CUSTOMERS INCURRED APPROXIMATELY \$45,000 IN LOSSES. BENEVENTO HAS RETURNED THAT AMOUNT TO HIS MEMBER FIRM, AND THE CUSTOMERS WERE FULLY COMPENSATED. THE FINDINGS ALSO STATED THAT BENEVENTO MISMARKED ORDER TICKETS FOR MUTUAL FUND TRADES IN CUSTOMER ACCOUNTS AS "UNSOLICITED" WHEN, IN FACT, THE TRADES WERE SOLICITED, CAUSING THE FIRM TO



MAINTAIN INACCURATE BOOKS AND RECORDS IN VIOLATION OF RULE 17A-3 OF THE EXCHANGE ACT.

Current Status:

Final

Resolution:

Acceptance, Waiver & Consent(AWC)

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:

08/04/2015

Sanctions Ordered:

Civil and Administrative Penalty(ies)/Fine(s)
Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type:	Suspension
Capacities Affected:	ALL CAPACITIES
Duration:	60 DAYS
Start Date:	08/17/2015
End Date:	10/15/2015

Monetary Sanction 1 of 1

Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00
Payment Plan:	DEFERRED
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	

.....

Reporting Source:	Individual
Regulatory Action Initiated By:	Financial Industry Regulatory Authority ("FINRA")
Sanction(s) Sought:	Other: N/A
Date Initiated:	08/04/2015
Docket/Case Number:	2013035369501
Employing firm when activity occurred which led to the regulatory action:	American Portfolios Financial Services, Inc.



Product Type:	Mutual Fund
Allegations:	Without admitting or denying the findings, Benevento consented to the sanctions and to the entry of findings that he recommended mutual fund switch transactions in customer accounts without having reasonable grounds for believing that such transactions were suitable for those customers in light of the nature of the recommended transactions, the frequency of the transactions, and the transaction costs incurred. The findings stated that in connection with those switch transactions, all of which involved the purchase and sale of Class A Mutual Fund shares that had front-end sales loads, Benevento's customers incurred approximately \$45,000 in losses. Benevento has returned that amount to his member firm, and the customers were fully compensated. The findings also stated that Benevento mismarked order tickets for mutual fund trades in customer accounts as "unsolicited" when, in fact, the trades were solicited, causing the firm to maintain inaccurate books and records in violation of Rule 17A-3 of the Exchange Act.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
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:	08/04/2015
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	All capacities.
Duration:	60 days
Start Date:	08/17/2015
End Date:	10/15/2015
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$5,000.00
Portion Levied against individual:	\$5,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	The complaint alleged that Mr. Benevento recommended mutual fund switch transactions in customer accounts without having reasonable grounds for believing



that such transactions were suitable for those customers in light of the nature, frequency, and costs of the transactions. The complaint also alleged that he caused the mutual fund trades to be mismarked as "unsolicited", when in fact, the trades were solicited. The complaint alleged that the customers incurred approximately \$45,000 in losses related to the trades. He consented without admitting/denying the allegations of the complaint and solely for the purpose of the proceeding.



Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: AXA ADVISORS

Allegations: PLAINTIFF ALLEGES RR MISREPRESENTED THE INVESTMENTS. IN ADDITION, PLAINTIFF CLAIMS THAT THE FIRM SHOULD BE HELD RESPONSIBLE FOR ANY AND ALL MONEY THAT HE MAY BE FORCED TO RETURN AS A RESULT OF A FRAUDULENT OUTSIDE INVESTMENT RECOMMENDED BY THE RR. DAMAGES NOT SPECIFIED.

Product Type: Other: INVESTMENTS

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): DAMAGES NOT SPECIFIED

Civil Litigation Information

Type of Court: State Court

Name of Court: SUPREME COURT OF THE STATE OF NEW YORK

Location of Court: STATE OF NEW YORK COUNTY OF NASSAU

Docket/Case #: 13038-11

Date Notice/Process Served: 09/13/2011

Litigation Pending? No

Disposition: Settled

Disposition Date: 05/30/2014

Monetary Compensation Amount: \$430,000.00

Individual Contribution Amount: \$172,000.00

Firm Statement WITHOUT ADMITTING LIABILITY, ALL PARTIES AGREED TO SETTLE THE MATTER FOR \$430,000.00. RR BENEVENTO'S ERRORS AND OMISSIONS CARRIER CONTRIBUTED \$172,000.00 TO THE SETTLMENT ON HIS BEHALF.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: AXA ADVISORS, LLC

Allegations: ALLEGED BREACH OF FIDUCIARY DUTY, NEGLIGENT



MISREPRESENTATION,UNJUST ENRICHMENT.

Product Type: Other: LIMITED PARTNERSHIP - PPM

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): UNSPECIFIED DAMAGES

Civil Litigation Information

Type of Court: State Court

Name of Court: SUPREME COURT OF THE STATE OF NEW YORK

Location of Court: COUNTY OF NASSAU

Docket/Case #: 13038-11

Date Notice/Process Served: 09/21/2011

Litigation Pending? No

Disposition: Settled

Disposition Date: 05/28/2014

Monetary Compensation Amount: \$430,000.00

Individual Contribution Amount: \$172,000.00

Broker Statement THE CONTESTED ALLEGATIONS CONCERN A PRIVATE LIMITED PARTNERSHIP INTRODUCED TO THE CUSTOMER IN 1997. I WAS NOT INVOLVED IN INTRODUCING THE INVESTMENT TO THE CUSTOMER. THE CUSTOMER MADE A DIRECT INVESTMENT IN THE PARTNERSHIP, AND THE INVESTMENT PRODUCED POSITIVE RETURNS. MY INSURANCE CARRIER DECIDED TO SETTLE THIS MATTER AND PAID MY CONTRIBUTION AMOUNT. THIS IS A SETTLEMENT BY ALL PARTIES OF DISPUTED CLAIMS WITHOUT ADMITTING LIABILITY OF ANY KIND.

Disclosure 2 of 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: AXA ADVISORS

Allegations: PLAINTIFF ALLEGES RR GAVE ADVICE AND MADE INVESTMENTS IN A FRAUDULENT INVESTMENT WITHOUT PERFORMING ADEQUATE DUE DILIGENCE. DAMAGES NOT SPECIFIED.

Product Type: Other: INVESTMENTS

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): DAMAGES NOT SPECIFIED

Civil Litigation Information

Type of Court: State Court

Name of Court: SUPREME COURT OF THE STATE OF NEW YORK



Location of Court: STATE OF NEW YORK COUNTY OF SUFFOLK

Docket/Case #: 11-3702

Date Notice/Process Served: 02/04/2011

Litigation Pending? No

Disposition: Settled

Disposition Date: 01/15/2014

Monetary Compensation Amount: \$150,000.00

Individual Contribution Amount: \$60,000.00

Firm Statement INITIAL MATTER WAS RECEIVED BY THE FIRM ON 8/2/10 AND WAS DISMISSED WITHOUT PREJUDICE. THE FIRM RECEIVED THE DISMISSAL ON 1/7/11. THE MATTER WAS THEN RE-FILED IN THE SUPREME COURT OF THE STATE OF NEW YORK. DOCUMENTS RECEIVED 2/4/11. THE MATTER IS STILL PENDING. *1/15/14 ALL PARTIES AGREED TO SETTLE THE MATTER FOR \$150,000.00. RR BENEVENTO'S ERRORS AND OMISSIONS CARRIER CONTRIBUTED \$60,000.00 TO THE SETTLEMENT ON HIS BEHALF.

.....

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: AXA ADVISORS, LLC

Allegations: THE CUSTOMER WAS NAMED AS A DEFENDANT IN A RECEIVER'S CLAW-BACK ACTION TO RECOVER PROFITS ON A FUND INVESTMENT MADE IN 1997. THE CUSTOMER'S THIRD-PARTY COMPLAINT AGAINST APPLICANT ALLEGED BREACH OF FIDUCIARY DUTY, AIDING AND ABETTING BREACH OF FIDUCIARY DUTY, NEGLIGENT MISREPRESENTATION, NEGLIGENCE, FAITHLESS SERVANT DOCTRINE, AND INDEMNIFICATION.

Product Type: Other: DIRECT INVESTMENT

Alleged Damages: \$0.00

Alleged Damages Amount Explanation (if amount not exact): DAMAGES NOT SPECIFIED

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: UNITED STATES DISTRICT COURT FOR SOUTHERN DISTRICT OF NEW YORK

Docket/Case #: 09-CV-7667 (RJS)

Filing date of arbitration/CFTC reparation or civil litigation: 07/02/2010

Customer Complaint Information



Date Complaint Received: 07/26/2010

Complaint Pending? No

Status: Withdrawn

Status Date: 01/07/2011

Settlement Amount:

Individual Contribution Amount:

Civil Litigation Information

Type of Court: State Court

Name of Court: SUPREME COURT OF THE STATE OF NEW YORK

Location of Court: STATE OF NEW YORK COUNTY OF SUFFOLK

Docket/Case #: 11-3702

Date Notice/Process Served: 02/14/2011

Litigation Pending? No

Disposition: Settled

Disposition Date: 01/15/2014

Monetary Compensation Amount: \$150,000.00

Individual Contribution Amount: \$60,000.00

Broker Statement THIS IS A SETTLEMENT BY ALL PARTIES OF DISPUTED CLAIMS WITHOUT ADMITTING LIABILITY OF ANY KIND.



End of Report

This page is intentionally left blank.