

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

Benjamin Securities Investment Company, Inc.

Prepared on July 13, 2011

Benjamin Securities Investment Company, Inc. was setup as a sole proprietorship in 1989. Our firm was incorporated in 1995 as a C Corporation.

Our three offices are listed below:

Main Office

Missouri City, Texas

This office is located near Houston, Texas in Fort Bend County. Ben and Joyce Smith work at this office.

Email: bsmith9381@comcast.com

Phone: 281-403-0009

Cell: 281-639-6544

Fax: 281-499-3035

Address: 3603 Ridgeview Drive, Missouri City, TX 77459

Supporting Office

Santa Cruz, California

This office is located south of Silicon Valley in Northern California. Jeri Ann Smith works at this office.

Email: jeriann@benjaminadvisors.com

Cell: 408-307-9504

Fax: 206-666-5036

Address: 210 33rd Avenue, Santa Cruz, CA 95062

Supporting Office

Torrance, California

This office is located near Los Angeles in Southern California. Cyrus Javadi works at this office.

Email: cyrus@benjaminadvisors.com

Cell: 408-307-9504

Address: 5530 W. 190th Street, #160, Torrance, CA 90503

For more information, you can view our website at: benjaminadvisors.com.

Company Organization

Benjamin Securities Investment Company, Inc. is organized as a corporation under the laws of Texas. According to Internal Revenue tax laws, the Company operates as a C Corporation. The shares of the Company are 100 percent owned by Benjamin F. Smith, Joyce N. Smith and Jeri Ann Smith. The Company is not affiliated with any other company, partnership, or any other type of organization.

List of Officers

Chief Executive Officer	Benjamin F. Smith
Vice-President	Jeri Ann Smith
Chief Financial Officer	Joyce N. Smith
Corporate Secretary	Joyce N. Smith

With approval, the company permits certain outside activities. At the present time, the company has approved the following outside activities.

Benjamin F. Smith: Partner in Smith & Smith, Certified Public Accountants
Co-trustee for Kathryn N. Brace management trust

Joyce N. Smith: Partner in Smith & Smith, Certified Public Accountants

This brochure provides information about the qualifications and business practices of Benjamin Securities Investment Company, Inc.. If you have any questions about the contents of this brochure, please contact us at 281-403-009. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Benjamin Securities Investment Company, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

This Year's Changes

Every year, Benjamin Securities Investment Company, Inc. updates this brochure. Clients are informed of the update through our privacy policy and they can access the latest version on our website at: benjaminadvisors.com under the notification section.

Prior to publication of this brochure, we made the prior ADV Part II form available. While the format is different, there is no material change in the content of the information or the services of our firm.

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Item 4 Advisory Business

Our Services

We provide portfolio management services for individual investors, including those just getting started with investments; those planning for home purchases, children's educations, or retirement; and those using their investments as retirement income. Each portfolio is individually managed according to the goals, risk profile, and tax exposure of the client. Managed portfolios include taxable cash accounts, IRAs, SEP, and trust accounts.

As your investment advisor, we research companies to find strong performance, and we actively invest in them for you. As an independent advisor, we are not tied into any company's investment products, so we can make choices that are most appropriate for your needs. And as experts in tax accounting, we take your tax considerations fully into account.

Ownership

We are a family run business. Your owners and registered principals are Ben and Joyce Smith along with their daughter, Jeri Ann Smith. Ben Smith has 45% ownership share, Joyce Smith has 45% ownership share, and Jeri Ann Smith has 10% ownership share. Cyrus Javadi recently joined the firm as an employee.

As of July 12, 2011, our firm manages \$10,814,029 under discretionary accounts and \$2,430,000 under non-discretionary accounts.

Item 5 Fees and Compensation

Discretionary Accounts

Most of our clients have set up discretionary accounts, which means we have permission from the client to invest immediately when the market opportunities arise. We primarily trade securities.

Fees

Our fee structure is based on percent of assets under management and varies based on the size of the portfolio and the services provided. In contrast to a commission-based structure, this fee structure is consistent with our long-term holding philosophy. (A commission-based structure encourages brokerage houses to execute frequent trades, which increases costs for their clients.)

Fees are collected from each account monthly based on percent of assets under management. The percent is document in the investment advisory contract for each customers and that percent is based on the services provided.

In addition to our management fees of % of assets under management, we charge trade cost associated with the cost charged by Southwest Securities. They charge \$27 for each trade with a \$2.50 document handling charge.

Item 6 Performance-Based Fees and Side-By-Side Management

No Performance Based Fees

No performance based fees are charged, that is, fees based on a share of capital gains or capital appreciation of assets of a client. These are typically charged within hedge funds and we are not a hedge fund. Per the statement in section 5, our fees are based on a percent of assets under management.

Item 7 Types of Clients

Our Clients

Most of our clients are individual investors with taxable investments or non-taxable retirement accounts. We also setup retirement accounts for small businesses. For some our larger clients, we provide the investment advice and management of trustee accounts. We will work with the law firm of your choice or we can recommend law firms that we worked with on prior trust accounts.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Our firm's investment principles

Long-term stock holdings

We believe in picking stocks based on financial fundamentals such as price-to-earnings ratio, price-to-book ratio, and debt-to-equity ratio. Given that our stock is chosen for its strong fundamentals, we advocate holding the stock for continued returns, lower transaction costs, and deferred taxes. We advocate stock investment over other financial assets because of its superior long-term return.

Value stocks for financial safety net

We recommend all customers have holdings in value stocks to ensure a financial safety net for their future. These stocks are selected primarily for their strong financial position, steady earnings and dividends, and advantageous market price. Value stocks include energy companies, consumer staples, and industrial products.

High-tech stock investments for growth

For clients with a sufficient financial safety net and who are willing to take more risk for potentially higher growth, we invest in growth companies with sound financial position, innovative products, and strategies to support their growth. Growth stocks are largely concentrated in high-technology industries such as pharmaceutical, semiconductor, telecommunications, and computer.

Individual portfolio allocation

We view each client as unique. Initially, we'll work with you to understand your current financial holdings and future goals, and we'll continue to work with you to make adjustments as your life changes. As with all of our clients, we'll strive to maintain a long-term relationship with you.

Cost effective services

Our firm has a low expense structure, and we are able to provide cost effective services. Once our client's investment become sufficient size to diversify their portfolio, we structure most of our customers' funds with direct stock investment. With this approach, our clients are not paying fees for mutual funds and annuities.

Item 9 Disciplinary Information

No disciplinary action associated with our firm

Our firm is formed as a family based based on trust and integrity within the firm and with our clients and regulatory agencies. We make every effort to follow the legal rules and regulations associated with our firm and industry.

- Our firm has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction.
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- Our firm has never been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
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- Our firm never been involved in a self-regulatory organization proceeding.

Item 10 Other Financial Industry Activities and Affiliations

CPA & Accounting Services

Two of the officers of Benjamin Securities Investment Company, Inc. are also Certified Public Accounts and run an accounting business, Smith & Smith CPA. These two officers are: Benjamin F. Smith and Joyce N. Smith. In addition to considering fundamental analysis of investment decisions, they also consider income tax ramification of their decisions. Smith & Smith CPA performs the accounting for Benjamin Securities Investment Company, Inc.; however, Smith & Smith CPA does not charge Benjamin Securities Investment Company, Inc. for these services.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Fiduciary Responsibility

In addition to client accounts, we also manage our personal portfolios and company account. Where appropriate for the client, we also recommend many of these same securities for their accounts. Or in the case of discretionary accounts, we will buy and sell securities in a similar pattern to our company and personal accounts. We primarily trade and sell securities with large market cap and our trades do not material affect the market for those securities. Therefore, we see no conflict of interest. We use the knowledge and judgment applied to our personal and company accounts to also manage our client's accounts, which we see as beneficial to our clients.

We act as a fiduciary for our clients. That means we work to understand our clients needs and our goals is to make investments that are in the best interest of the client.

Family Run Business

Our firm is a family run and we adhere to high ethical standards of integrity and respect for client's assets. We manage our client's assets to help meet the goals and objectives of the client within the limits of our capabilities to provide returns on their assets. We hold ourselves to a higher standard than what is required by the letter of the law.

Legal Ethical Standards

And we certainly following the SEC code of ethics, Rule 204 A-1 (<http://www.sec.gov/rules/final/ia-2256.htm>). Each code must set high standards of conduct and require compliance with federal securities laws. Such codes should require the reporting of personal securities transactions by certain personnel and pre-approval by those personnel of certain transactions, and establish record-keeping criteria to document compliance. We are family run with 4 registered representatives. We keep close communication and ensure that all work maintains high ethical standards.

Item 12 Brokerage Practices

Our Practices

Our firm subscribes to Morning Star, New York Times, and the Wall Street Journal. We read these sources to help analyze and formulate our investment recommendations. Most of our accounts hold stock securities. We have a few accounts holding mutual funds, AmericanFunds and OppenheimerFunds,

Our clearing house is Southwest Securities. That's the firm we use to make trades and hold the accounts of our clients. Our trades and recommendations are made by our firm and we are independent from the recommendations of other brokerage firms. That independence allows us to make recommendations that we consider best for our clients.

Item 13 Review of Accounts

Account Reviews

Our stock securities accounts with Southwest Securities are reviewed at least monthly.

Our mutual fund accounts with AmericanFunds and OppenhiemerFunds are reviewed at least annually.

Client may also at any time call to discuss or request changes to their accounts, particularly if there have been changes to their life situation.

Item 14 Client Referrals and Other Compensation

No other Compensation

Our clients pay for our services directly based on the investment services they receive from our firm. We receive no other compensation for our services.

Item 15 Custody

Our Clients Custodians

Southwest Securities is the custodian for our our customer's stock securities. For our mutual fund customers, American Funds and OppenheimerFunds are the custodians. As custodians, these firms hold our clients funds and we use their firm to execute and clear transactions that we make on our client's accounts. Clients will receive monthly or quarterly statements from our custodian firms. We recommend that clients carefully review these statements and inform us of any questions or concerns. We will work with the custodian to correct any issues.

Item 16 Investment Discretion

Discretionary Accounts

We use discretionary accounts when our client wants us to manage their account or accounts. Most of the accounts that we manage belong to people that we have known for many years. Since we do not advertise, we simply do not have people walking in with new accounts. We have a web site; however, we have never received a call as a result of our having this web site. The website is a reference for our existing customers.

When the subject of our managing an account comes up, we discuss this issue with the client. This includes reviewing our investment advisory contract with them. We believe there are several issues covered on our contract that appeals to client. We do not charge any upfront fees. Our contract is an “at will” contract and can be terminated by our client with no exit charges and in fact if a contract is terminated or if the client moves the account to another broker we do not charge a partial month management fee for the exit month.

We will only approve a discretionary account for people which we believe are compatible with us. We try to do a good job on each account and we are available to discuss the account with the client at any time.

Benjamin Securities Investment Company, Inc. is licensed and/or registered as investment advisors in Texas and California. This means the Company has the authority to sign Investment Advisory Contracts for customers living in Texas and/or California.

For each client that selects to proceed with a discretionary account, we provide an investment advisory agreement which documents this arrangement and the associated fees. The standard form is available on our website. The specific fee arrangement is 1% to 2% of assets and based on the services offered.

Item 17 Voting Client Securities

Voting

The clients receive the voting materials for the securities that they hold. They receive it directly from the companies. The client can choose whether or not they want to vote.

Item 18 Financial Information

Our Financials

Our firm meets the financial and capital requirements of FINRA. We do not disclose our balance sheet as we are a private firm and we do not hold our clients assets. Regarding the security of our clients assets, they are encouraged to review the balance sheets of our custodian firms, Southwest Securities, American Funds, and OppenheimerFunds. Our firms has review their financial status and we consider these firms good custodians for our clients assets.

Item 19 Requirements for State-Registered Advisers

Background and Responsibilities

Personnel

Benjamin F. Smith has and MBA from Texas A&I and a B.S. in engineering from University of Arkansas. Benjamin F. Smith holds the following securities registrations: Series 7, 24, 27, and 63. Benjamin F. Smith also holds a valid license as a Certified Public Accountant. Benjamin Smith has experience since 1987 in the securities business. Benjamin is located in the main office in Missouri City, Texas.

Joyce N. Smith holds a bachelor's degree from the University of Arkansas. She holds the following securities registrations: Series 7, 24, 27, and 63. She also holds a valid license as a Certified Public Accountant and was honored as placing number 3 on the CPA exam by the Texas State Board of Public Accountancy. Joyce is located in the main office in Missouri City, Texas.

Jeri Ann Smith holds an MBA from Harvard University and a B.S. in engineering from UCLA. She currently holds Series 7, Series 63, Series 65, and Series 24 registrations. Jeri Ann resides in Santa Cruz, CA.

Cyrus Javadi holds an MBA from Pepperdine University and B.A. in Finance from Texas A&M University. He also holds a Series 7 and Series 63 license. Cyrus resides in San Pedro, CA.

Responsibilities

Benjamin F. Smith is a registered advisor, principal, and the chief executive officer of the firm. Benjamin has been the chief executive officer since the formation of the firm and also held this position when the firm was a sole proprietorship.

Joyce N. Smith is a registered advisor, principal, and the operations and financial principal of the firm. Joyce Smith is responsible for preparing all accounting records for the firm. This includes the transaction listing, general ledger, and financial statements including a balance sheet and income statement.

Jeri Ann Smith is a registered advisor, principal, and manages compliance, website development, and business continuity (Vice-President). She is responsible for learning new regulatory requirement, incorporating the changes in the supervisory procedure manual, and training the all personnel in the firm on the new procedures. She has also created an external customer website and internal company website. The internal website has compliance activities including our procedure manual. In addition, Jeri Ann is receiving training in all aspects of the business to ensure business continuity. Jeri Ann Smith also will mentor Cyrus.

Cyrus Javadi is a new employee and registered advisor. He will provide additional compliance backup, website backup, and business continuity.