

## **Part 2A of Form ADV: Firm Brochure**

### **Item 1: COVER PAGE**

Monument Investments, Inc.  
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Dallas, TX 75229

Contact Information:  
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1-214-360-9360

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This page provides information about the qualifications and business practices of Monument Investments, Inc. If you have any questions about the contents of this brochure, please contact us at 1-214-360-9360. 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.

Being a Registered Investment Advisor does not imply a certain level of skill or training.

**Item 2: Material Changes**

n/a

### **Item 3: Table of Contents**

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**Item 4: Advisory Business**

Monument Investments, Inc. will provide a range of financial services to its client. Monument Investments, Inc. will review the client's present financial situations, will perform investment and financial analysis and will provide advise, counsel and recommendations. These services may relate to securities, real estate, estate planning and other aspects of investment advisory services. Monument Investments, Inc. does not provide any publication or report on a subscription basis or for a fee. Monument Investments, Inc. has been in business since September 1996. The principal officer is Jay Paul Hamilton.

Following the initial review of the client's financial picture, Monument Investments, Inc. will provide ongoing management of the assets, including a review and update on a periodic basis, for no additional charge, for so long as the client participates in a portfolio management program with Monument Investments, Inc. as described below.

Upon request by its client, Monument Investments, Inc will manage such client's investment assets (the "portfolio") on an individualized basis to meet the client's specific investment goals. The Portfolio will be invested in a variety of investment products, including no-load mutual funds, stocks, bonds, options and, at times, for defensive purposes, in money market accounts or cash equivalents.

None of the services provided are considered to be financial planning services or services with a similar term.

## **Item 5 Fees and Compensation**

Monument Investments, Inc. offers investment advisory services based on a percentage of assets under management. The fee charged is in addition to the management fees and other expenses charged by any investment companies (i.e. money market or mutual funds in which clients are invested).

The Fee will be calculated on a monthly or quarterly basis depending upon the agreement with the particular client through direct debit of the customer's account within the first ten business days of the first month following the most recently completed calendar month/quarter. The fee will be calculated based upon the market value of the portfolio, including cash equivalents, determined as of the close of business of the last day of such preceding calendar month/quarter. In the case of a new client, it will be based on the day the portfolio account is opened. The client's account will be debited automatically for such fees due within the first ten business day of such immediately following month. If the debt has not been paid within 30 days after the first day the charge has accrued, securities positions within the accounts may be liquidated to cover the amount due. The portfolio fee may also be a fixed fee as agreed upon between the client and Monument Investments, Inc.

Monument Investments, Inc. will determine each client's portfolio management fee on an individual basis taking into account the complexities of the case, the amount of continuing in-depth financial analysis that will be required and the time estimated to manage the client's portfolio. The fee for portfolio management services will range from .05 to 2% (computed on a per annum basis) of the value of the portfolio as determined in the manner set forth above, and will be approved by the client upon the execution of the Advisory Services Agreement between the client and Monument Investments, Inc. All percentage fee amounts described herein are quoted on a per annum basis; for partial months/quarters, the percentage fee amount shall be prorated, calculated based on the actual number of days elapsed.

Clients shall have the right to terminate the Advisory Services Agreement, without penalty, at any time within five (5) business days after the date of the client's signature. Thereafter, the client or Monument Investments, Inc. may terminate the Advisory Services Agreement at any time and for any reason, upon thirty (30) days prior written notice to the other party. Upon notice of termination, Monument Investments, Inc. may charge a termination fee of up to 1% of the value of the portfolio.

**Item 5: Fees and Compensation – continued**

Under management as of December 31, 2010

Non-Discretionary Accounts (61)	\$ 24,274,902.02
Discretionary Accounts (9)	\$ 11,487,375.22

**Item 6: Performance-Based Fees and Side-by-Side Management**

n/a

**Item 7: Type of Clients**

Monument Investments, Inc. generally provides investment advice to Individuals, trusts, estates and charitable organizations.

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

Monument Investments, Inc. security analysis is based on fundamental and technical methods. Analysis is performed using financial newspapers and magazines, internet, research materials prepared by others, corporate rating services, annual reports, prospectuses and filings from the Securities and Exchange Commission.

Monument Investments, Inc.'s main strategies for investment advice are long-term purchases, as well as short term purchases and option writing (covered calls only).

Any investments including stocks, bonds, mutual funds and cash carry with them inherent risk that could result in losses.

Fundamental analysis carries the risk that information relied upon may be inaccurate or incomplete. Technical analysis is inherently imperfect as it relies on history to determine future outcomes.

**Item 9: Disciplinary Information**

n/a

**Item 10: Other Financial Industry Activities and Affiliations**

Monument Investments, Inc. and its associates are not in any partnership in which clients are solicited to invest.

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

Monument Investments, Inc. employees are restricted from trading activities which do not put the client's interest first. No trades will be made if there is a possibility that the trade will influence the market on the stock.

In the event that personal employee trading exceeds ½ of 1% of the average daily volume of a stock being traded a record will be kept on such trades and research will be performed to determine if the stock was negatively influenced by that trade.

Monument Investments, Inc. and/or its related persons may buy or sell for themselves securities that they also recommend to clients.

Upon request we will provide our code of ethics.

**Item 12: Brokerage Practices**

Factors used in determining the selection of a broker/dealer include the full range of products offered by the broker compared to that of other brokerage houses and applicant believes that the commissions of the broker/dealer are competitive with other brokers. There are no limitations on the authority of Monument Investments, Inc. and/or its related person to determine, without obtaining specific client consent, the securities to be bought or sold, the amount of securities to be bought or sold and the broker or dealer to be used.

**Item 13: Review of Accounts**

If a client retains Monument Investments, Inc. for continuous advice, counsel and recommendations, and monitoring of a client's financial situation and for an annual review and update of the original plan, or for the performance of miscellaneous financial services, then Monument Investments, Inc. will review the account of the client on a quarterly basis or otherwise, depending upon the preference of the client, and depending upon the nature of the investments. Review will be triggered by the passage of time, such as on a quarterly basis, or other factors, as requested by the client. Such periodic reviews will be conducted by Monument Investments, Inc. for no additional charge, for so long as the client participates in a portfolio management program with Monument Investments, Inc.

There will be one reviewer for the accounts of Monument Investments, Inc., Jay Paul Hamilton, the President of the Company. Other persons may be hired by Monument Investments, Inc. in the future to undertake review of advisory accounts. The reviewers do not receive specific instructions from the company on performing reviews.

Monument Investments, Inc. provides portfolio statements to clients on a monthly/quarterly basis.

**Item 14: Client Referrals and Other Compensation**

Monument Investments, Inc. is not in the practice of paying cash and/or giving economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients.

Monument Investments, Inc. does not compensate, directly or indirectly, any person for client referrals.

**Item 15: Custody**

Monument Investments, Inc. does not act as custodian for any of its clients.

**Item 16: Investment Discretion**

Monument Investments, Inc. accepts accounts with discretionary authority. The account application that each client completes and signs includes authorization given to Monument Investments, Inc. to make discretionary investment decisions. However, should the client requests notification immediately before or after a purchase or sale, Monument Investments, Inc. will abide by those wishes.

**Item 17: Voting Client Securities**

For those clients that choose Monument Investments, Inc. voting policy on proxies is to give attention to the managements direction with out carte blanche acceptance. Monument Investments, Inc. will vote against management if felt it is in the best interest of our client. Should a client desire to direct a vote in a particular solicitation and/or obtain information on how Monument Investments, Inc. votes their securities, the client simply needs to communicate their wishes to Monument Investments, Inc.

For those clients who choose not to have Monument Investments, Inc. vote their proxies, they may make that selection on the account form they complete and sign. If at some point in time they choose to vote for themselves, they can notify out office and the proper paperwork will be completed to make that change.

**Item 18: Financial Information**

n/a

**Item 19: Requirements for State-Registered Advisers**

Name: Jay Paul Hamilton

Year of Birth: 1960

Formal Education after High School:

1980 - 83	Hardin Simmons University BBA Finance
1983 - 85	Hardin Simmons University MBA Finance

Business background for preceding ten (10) years:

01/1986–09/1996	J P Morgan Chase, Dallas, Texas, Portfolio Manager (formerly Texas Commerce Bank)
09/1996-Present	Monument Investments, Inc., Dallas, Texas President