

SECURITIES AND EXCHANGE COMMISSION

FORM 13F-HR

Initial quarterly Form 13F holdings report filed by institutional managers

Filing Date: **2004-08-12** | Period of Report: **2004-06-30**
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FILER

BRUCE BENT & ASSOCIATES INC/NY

CIK: **1077567** | IRS No.: **133247330** | State of Incorporation: **NY**
Type: **13F-HR** | Act: **34** | File No.: **028-07444** | Film No.: **04968473**

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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

Form 13F

Form 13F COVER PAGE

Report for the Calendar Year or Quarter Ended: June 30, 2004

Check here if Amendment []; Amendment Number:
This Amendment (Check only one.): [] is a restatement.
[] adds new holdings entries.

Institutional Investment Manager Filing this Report:

Name: Bruce Bent & Associates Inc.
Address: 950 Third Avenue, 28th Floor
New York, NY 10022

13F File Number: 28-07444

The institutional investment manager filing this report and the person by whom it is signed hereby represent that the person signing the report is authorized to submit it, that all information contained herein is true, correct and complete, and that it is understood that all required items, statements, schedules, lists, and tables, are considered integral parts of this form.

Person Signing this Report on Behalf of Reporting Manager:

Name: Bruce D. Bent
Title: President
Phone: 212 -752-6255

Signature, Place, and Date of Signing:

/s/ Bruce D. Bent New York, NY August 09, 2004

Report Type (Check only one.):

- [X] 13F HOLDINGS REPORT.
[] 13F NOTICE.
[] 13F COMBINATION REPORT.

FORM 13F SUMMARY PAGE

Report Summary:

Number of Other Included Managers: 0
Form13F Information Table Entry Total: 31
Form13F Information Table Value Total: \$127,514 (thousands)

List of Other Included Managers:

Provide a numbered list of the name(s) and Form 13F file number(s) of all institutional managers with respect to which this report is filed, other than the manager filing this report.

NONE

NAME OF ISSUER	TITLE OF CLASS	CUSIP	FORM 13F INFORMATION TABLE					VOTING AUTHORITY			
			VALUE (x\$1000)	SHARES/ PRN	SH/ AMT	PUT/ CALL	INVSTMT DISCRETN	OTHER MANAGERS	SOLE	SHARED	NONE
ABBOTT LABS	COM	002824100	1076	26405	SH		SOLE		26405	0	0
ALLIANCE CAP MGMT HLDG L P	UNIT LTD PARTN	01855A101	1494	44000	SH		SOLE		44000	0	0
AMGEN INC	COM	031162100	1894	34700	SH		SOLE		34700	0	0
ANDRX CORP DEL	ANDRX GROUP	034553107	4762	170500	SH		SOLE		170500	0	0
BERKSHIRE HATHAWAY INC DEL	CL B	084670207	1067	361	SH		SOLE		361	0	0
BLOCK H & R INC	COM	093671105	10288	215772	SH		SOLE		215772	0	0
BOSTON SCIENTIFIC CORP	COM	101137107	13807	322600	SH		SOLE		322600	0	0
CISCO SYS INC	COM	17275R102	5889	248500	SH		SOLE		248500	0	0
COCA COLA CO	COM	191216100	378	7487	SH		SOLE		7487	0	0

ELAN PLC	ADR	284131208	4094	165500	SH	SOLE	165500	0	0
EXXON MOBIL CORP	COM	30231G102	213	4804	SH	SOLE	4804	0	0
FOREST LABS INC	COM	345838106	3601	63580	SH	SOLE	63580	0	0
GENERAL ELEC CO	COM	369604103	1376	42470	SH	SOLE	42470	0	0
IMCLONE SYS INC	COM	45245W109	256	2985	SH	SOLE	2985	0	0
J P MORGAN CHASE & CO	COM	46625H100	3514	90625	SH	SOLE	90625	0	0
JOHNSON & JOHNSON	COM	478160104	15528	278785	SH	SOLE	278785	0	0
MASSEY ENERGY CORP	COM	576206106	1255	44500	SH	SOLE	44500	0	0
MERCK & CO INC	COM	589331107	580	12200	SH	SOLE	12200	0	0
MICROSOFT CORP	COM	594918104	2259	79084	SH	SOLE	79084	0	0
MYLAN LABS INC	COM	628530107	2952	145800	SH	SOLE	145800	0	0
ONLINE RES CORP	COM	68273G101	6817	1002553	SH	SOLE	1002553	0	0
PAYCHEX INC	COM	704326107	484	14300	SH	SOLE	14300	0	0
PFIZER INC	COM	717081103	1243	36267	SH	SOLE	36267	0	0
PIMCO FDS PAC INVT MG	MUTUAL	693390445	935	87862	SH	SOLE	87862	0	0
SANOFI-SYNTHELABO	SPONSORED ADR	80105N105	6708	209700	SH	SOLE	209700	0	0
SCHERING PLOUGH CORP	COM	806605101	6655	360100	SH	SOLE	360100	0	0
SCHLUMBERGER LTD	COM	806857108	3847	60570	SH	SOLE	60570	0	0
ST JUDE MED INC	COM	790849103	4622	61100	SH	SOLE	61100	0	0
SYNOVIS LIFE TECHNOLOGIES IN	COM	87162G105	859	79900	SH	SOLE	79900	0	0
TRIBUNE CO NEW	COM	896047107	4663	102384	SH	SOLE	102384	0	0
ZIMMER HLDGS INC	COM	98956P102	14398	163240	SH	SOLE	163240	0	0

</TABLE>