

**Item 1 Cover Page**

A.

**Thomas H. Breiter**

Breiter Capital Management, Inc.

Brochure Supplement  
Dated 2/6/2012

Contact: Thomas H. Breiter, Chief Compliance Officer  
101 South Bay Boulevard, Suite B4  
Anna Maria, Florida 34216

B.

**This Brochure Supplement provides information about Thomas H. Breiter that supplements the Breiter Capital Management, Inc. Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Breiter, Chief Compliance Officer, if you did *not* receive Breiter Capital Management's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Thomas H. Breiter is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Thomas H. Breiter was born in 1960. Mr. Breiter graduated from Columbia College in 1985, with a Bachelor of Arts degree in Business Administration. Mr. Breiter has been President and Chief Compliance Officer of Breiter Capital Management, Inc. since 1992.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

- A. Mr. Breiter is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Breiter is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

None.

**Item 6 Supervision**

Breiter Capital Management, Inc. provides investment advisory and supervisory services in accordance with current state regulatory requirements. Breiter Capital Management, Inc.'s Chief Compliance Officer, Thomas H. Breiter, is primarily responsible for overseeing the activities of Breiter Capital Management, Inc.'s supervised persons. Mr. Breiter also monitors accounts and conducts account reviews on at least an annual basis. Should a client have any questions regarding the Breiter Capital Management, Inc.'s supervision or compliance practices, please contact Mr. Breiter at (941) 778-1900.

**Item 7 State-Registered Investment Advisers**

- A. A routine examination of Breiter Capital by the Florida Division of Securities in January 1993 revealed that Mr. Breiter's registration as an advisory representative of the firm was not complete; Mr. Breiter believed the process had been previously completed. The registration was subsequently finalized, and the matter was settled in April of 1993 with Mr. Breiter ensuring that all advisory representatives of the firm would be properly registered and payment of an administrative fine of \$2,500. No further action was taken.
- B. Mr. Breiter has never been the subject of a bankruptcy petition.

**Item 1 Cover Page**

A.

**Thomas A. Tollette**

Breiter Capital Management, Inc.

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101 South Bay Boulevard, Suite B4  
Anna Maria, Florida 34216

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**This Brochure Supplement provides information about Thomas A. Tollette that supplements the Breiter Capital Management, Inc. Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Breiter, Chief Compliance Officer, if you did *not* receive Breiter Capital Management's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Thomas A. Tollette is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Thomas A. Tollette was born in 1938. Mr. Tollette graduated from Michigan State University in 1960, with a Bachelor of Science degree in Economics and Psychology. Mr. Tollette has employed as an investment adviser representative of Breiter Capital Management, Inc. since 2004.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

- A. Mr. Tollette is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Tollette is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

None.

**Item 6 Supervision**

Breiter Capital Management, Inc. provides investment advisory and supervisory services in accordance with current state regulatory requirements. Breiter Capital Management, Inc.'s Chief Compliance Officer, Thomas H. Breiter, is primarily responsible for overseeing the activities of Breiter Capital Management, Inc.'s supervised persons. Mr. Breiter also monitors accounts and conducts account reviews on at least an annual basis. Should a client have any questions regarding the Breiter Capital Management, Inc.'s supervision or compliance practices, please contact Mr. Breiter at (941) 778-1900.

**Item 7 State-Registered Investment Advisers**

- A. In 1977, Wisconsin Securities Regulators alleged that from July, 1968 to June of 1977 Mr. Tollette accepted orders to buy and sell securities in client accounts from someone other than the client, without written authorization on file; Mr. Tollette believed he had sufficient authorization. Mr. Tollette's securities license was suspended in the State of Wisconsin for a period of two weeks while the matter was resolved. The license was reinstated on October 2<sup>nd</sup> 1977 and Mr. Tollette was directed to successfully complete the Wisconsin Securities Agent's Exam before April 1<sup>st</sup>, 1978, which he did.
- B. Mr. Tollette has never been the subject of a bankruptcy petition.

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A.

**Geoffrey H. Niebaum**

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101 South Bay Boulevard, Suite B4  
Anna Maria, Florida 34216

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**This Brochure Supplement provides information about Geoffrey H. Niebaum that supplements the Breiter Capital Management, Inc. Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Breiter, Chief Compliance Officer, if you did *not* receive Breiter Capital Management's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Geoffrey H. Niebaum is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Geoffrey H. Niebaum was born in 1976. Mr. Niebaum graduated from the University of South Florida in 2004 with an MBA degree and from St. Leo University in 1999 with a Bachelor of Arts degree in Business.. Mr. Niebaum has been employed as an investment adviser representative of Breiter Capital Management, Inc. since 2007. From 2004 to 2007, Mr. Niebaum was employed by Citigroup Global Markets Inc., as a Financial Advisor.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

- A. Mr. Niebaum is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Niebaum is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

None.

**Item 6 Supervision**

Breiter Capital Management, Inc. provides investment advisory and supervisory services in accordance with current state regulatory requirements. Breiter Capital Management, Inc.'s Chief Compliance Officer, Thomas H. Breiter, is primarily responsible for overseeing the activities of Breiter Capital Management, Inc.'s supervised persons. Mr. Breiter also monitors accounts and conducts account reviews on at least an annual basis. Should a client have any questions regarding the Breiter Capital Management, Inc.'s supervision or compliance practices, please contact Mr. Breiter at (941) 778-1900.

**Item 7 State-Registered Investment Advisers**

- A. Mr. Niebaum has never been involved in an arbitration proceeding or a civil, self-regulatory, or administrative proceeding.
- B. Mr. Niebaum has never been the subject of a bankruptcy petition.

**Item 1 Cover Page**

A.

**Andria K. Ludlum**

Breiter Capital Management, Inc.

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Dated 2/6/2012

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Anna Maria, Florida 34216

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**This Brochure Supplement provides information about Andria K. Ludlum that supplements the Breiter Capital Management, Inc. Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Breiter, Chief Compliance Officer, if you did *not* receive Breiter Capital Management's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Andria K. Ludlum is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Andria K. Ludlum was born in 1974. Ms. Ludlum graduated from Western Michigan University in 1997 with a Bachelor of Arts degree in Business Administration. Ms. Ludlum has been employed as an Office Manager of Breiter Capital Management, Inc. since 2000.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

- A. Ms. Ludlum is not actively engaged in any other investment-related businesses or occupations.
- B. Ms. Ludlum is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

None.

**Item 6 Supervision**

Breiter Capital Management, Inc. provides investment advisory and supervisory services in accordance with current state regulatory requirements. Breiter Capital Management, Inc.'s Chief Compliance Officer, Thomas H. Breiter, is primarily responsible for overseeing the activities of Breiter Capital Management, Inc.'s supervised persons. Mr. Breiter also monitors accounts and conducts account reviews on at least an annual basis. Should a client have any questions regarding the Breiter Capital Management, Inc.'s supervision or compliance practices, please contact Mr. Breiter at (941) 778-1900.

**Item 7 State-Registered Investment Advisers**

- A. Ms. Ludlum has never been involved in an arbitration proceeding or a civil, self-regulatory, or administrative proceeding.
- B. Ms. Ludlum has never been the subject of a bankruptcy petition.