

Alta Via Capital

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June 12, 2020

FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Alta Via Capital. If you have any questions about the contents of this brochure, please contact Patrick Gaynor at (925) 828-1274 and/or via email at patrick@altavia-capital.com. 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 Patrick Gaynor also is available on the California Department of Business Oversight's website at www.dbo.ca.gov.

Although Alta Via Capital may use the term "registered investment advisor" or use the term "registered" through this Form ADV Part 2A, the use of these terms is not intended to imply a certain level of skill or training.

Item 2: Material Changes

The following is a summary of the material changes made to this version of the Disclosure Brochure:

PTRC Investments has changed its name to Alta Via Capital.

Alta Via Capital has changed its business address to the following:
4125 Hopyard Road Suite 225, Pleasanton, CA 94588

New email addresses for Alta Via Capital contacts are as follows:

Patrick Gaynor, President & Chief Compliance Officer patrick@altavia-capital.com

Tammara Pohl tammy@altavia-capital.com

The Chief Compliance Officer at Alta Via Capital is now Patrick Gaynor.

Alta Via Capital has entered into an agreement with Dragos Georgescu and Carl Gabler whereby they will manage all strategies in the QF Strategies division and have full autonomy and direction over their respective strategies. More information about their background can be found on ADV Part 2B brochure supplement.

In Item 4, Alta Via Capital ownership has changed with the owners listed on ADV Part 1A Schedule A.

In Item 5 and 8, Alta Via Capital now offers the following strategies to clients:

Dividend Aristocrat Covered Call – Market Neutral

Dividend Aristocrat Covered Call – Alpha Strategy

QF Strategies

Small-Cap Growth

Small/Mid-Cap Growth

Large-Cap Growth

Concentrated Equity Growth

All-Cap Growth

Large-Cap Dividend

Balanced/Custom Tailored Accounts

In Item 12, Alta Via Capital has entered into a new custodial relationship with Charles Schwab.

In Item 20, Alta Via has updated its privacy policy

Item 3: Table of Contents

Contents

Item 1: Cover Page

Item 2: Material Changes

Item 3: Table of Contents

Item 4: Advisory Business

Item 5: Fees and Compensation

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

Item 7: Types of Clients

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

Item 9: Disciplinary Information

Item 10: Other Financial Industry Activities and Affiliations

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

Item 12: Brokerage Practices

Item 13: Review of Accounts

Item 14: Client Referrals and Other Compensation

Item 15: Custody

Item 16: Investment Discretion

Item 17: Voting Client Securities

Item 18: Financial Information

Item 19: Requirements of State-Registered Advisers

Item 20: Additional Information

Form ADV Part 2B – Brochure Supplement

Item 4: Advisory Business

A.

Description of Advisory Firm

Alta Via Capital is a registered investment advisor firm established in January 2018 to provide investment advisory and financial planning services to high net worth individuals, individuals (other than high net worth individuals), charitable organizations and corporations or other businesses (herein referred to as "Client" or "Clients") on a discretionary basis.

Principal Owners

Alta Via Capital's principal owner is Patrick Gaynor.

Below we provide information about our programs and services. Please note that the terms of each Client's Investment Advisory Agreement ("Advisory Agreement") are negotiable; therefore, the following information is necessarily general and does not address the specific details applicable to each Client. Clients should refer to their individual Advisory Agreement for specific terms that apply to them.

B.

Managed Account Services

We offer ongoing discretionary investment management services to meet the needs of clients with a wide range of financial needs as more fully described below.

Through the Managed Account Service, an Alta Via representative works closely with the Client in order to develop a thorough account profile for the "Managed Assets," including information about the Client's personal and financial situation, investment objectives, risk tolerance, liquidity needs, and investment time horizon (all the "Suitability Information"), as well as reasonable investment restrictions the Client wishes to impose on the Client's accounts ("Reasonable Restrictions"). Using this information, the Representative will be responsible for developing and maintaining a Portfolio, providing continuous and regular investment management services of the client's Managed Assets, placing orders for the purchase, sale, and exchange of Managed Assets; modifying the Portfolio in a manner intended to achieve the account's objective, on a fully discretionary basis, subject to any investment restrictions Client imposes, and re-allocating and adjusting the Portfolio, as appropriate.

Alta Via Capital offers the following strategies for clients:

- Dividend Aristocrat Covered Call – Market Neutral
- Dividend Aristocrat Covered Call – Alpha Strategy

- QF Strategies – Small Cap Growth
- QF Strategies – Small/Mid Cap Growth
- QF Strategies – Large Cap Growth
- QF Strategies – Concentrated Equity Growth
- QF Strategies – All-Cap Growth
- QF Strategies – Large Cap Dividend
- QF Strategies – Balanced/Custom Tailored Accounts

All material conflicts of interest under CCR Section 260.238 (k) are disclosed regarding the

investment adviser which could be reasonably expected to impair the rendering of unbiased and objective advice.

Termination of Account

Clients who wish to terminate their account must notify Alta Via Capital in writing. If services are terminated within (5) business days of executing the Advisory Agreement, services will be terminated without penalty. After the initial five (5) business days, the client may be responsible for payment of fees for the number of days services are provided by Alta Via Capital prior to receipt of the notice of termination.

C. Client Preferences

Alta Via Capital may tailor its advisory services to the specific needs and objectives of each advisory client. Clients may also impose restrictions on investing in certain securities or types of securities most of which is generally covered in the client's Advisory Agreement.

D. Wrap Fee Programs

Alta Via Capital does not participate in any wrap fee programs by providing portfolio management services.

E. Assets under Management

At the beginning of 2020, Alta Via Capital had approximately \$13.2M under management on a discretionary basis.

Please note that in the future, the amount of assets Alta Via Capital manages may be disclosed by rounding to the nearest \$100,000. Alta Via Capital's "as of" date will not be more than three months before the date Alta Via Capital last updated its Brochure in response to Item 4.E of Form ADV Part 2A.

Item 5: Fees and Compensation

For Alta Via Capital's services, the Client will pay a Managed Account Fee quarterly in arrears based upon the account's value on the last business day of the preceding calendar quarter and is calculated on a pro rata basis for partial quarters. In accordance with the flat % fee for Managed Account Fees, Alta Via Capital shall not be compensated on the basis of a share of capital gains, capital appreciation of the funds, or any portion of the funds of the Client.

For example, a Managed Account Service client with an account worth \$100,000 and a hypothetical annual fee of 1% will incur the following annual fee:

$$\$100,000 \times 1\% = \$1,000$$

Below are the standard fees generally quoted for prospective clients. Existing clients may have different fee arrangements from those stated below, and actual rates are negotiable. Unless otherwise specified below or in the advisory contract that Alta Via enters into with a particular client, Alta Via's fees will be automatically deducted from client accounts on a quarterly basis, in arrears.

Strategy

Annual Fee

Dividend Aristocrat Covered Call – Market Neutral	1%
Dividend Aristocrat Covered Call – Alpha Strategy	1%
QF Strategies - Small-Cap Growth	1%
QF Strategies - Small/Mid-Cap Growth	1%
QF Strategies - Large-Cap Growth	1%
QF Strategies - Concentrated Equity Growth	2%
QF Strategies - All-Cap Growth	1%
QF Strategies - Large-Cap Dividend	1%
QF Strategies - Balanced/Custom Tailored Accounts	negotiable

Negotiability of Fees & Other Terms

For all services, we have the discretion to negotiate our fees, minimum account size, minimum annual fees, and other terms of each Client's relationship with us, and to negotiate different fees, minimums, or other terms on a client-by-client basis. When considering these matters, we usually consider the amount of assets to be placed under management by the client and related accounts, anticipated future revenues and anticipated future assets or other business from the client or related persons, and other existing or anticipated relationships. We may elect, at our discretion, to aggregate related Client accounts for the purpose of achieving the minimum account size requirements and determining fees. Because Management Fees and other terms of our programs and services may be negotiated separately with individual clients, some accounts pay lower Management Fees than other accounts. Waivers, discounts or more favorable terms not generally available to other clients may be offered to family members and friends of our employees and affiliates.

Risk of Liquidations to Pay Fees

Once the end of a quarter occurs, the Custodian will be authorized to deduct the Management Fees directly from the Client's account. If sufficient cash is not available in the Account to pay the Management Fees when due, the Custodian will liquidate securities selected by the Custodian or us without prior notice to the client. If the liquidated securities have declined in value, the client will realize a loss and lose the opportunity for future appreciation of the securities.

Accounts with More Than One Custodian

For Accounts with assets maintained with more than one Custodian, we will usually calculate the value of the Account and the Management Fees separately for each Custodian, as we determine at our discretion. The valuation method and time periods used to value the Account and calculate Management Fees will be applied consistently for each Custodian, but may differ from the valuation method and time periods used to value the Account or calculate combined Management Fees of other Custodians.

Except when we determine the fair value of an Account or asset, as provided above, account value shall be determined by reference to the valuations provided by or available from each Custodian, as of the close of the last day of each period for which Management Fees are calculated. If the last day of a period for which we calculate Management Fees is different than the last day of a Custodian's reporting or statement period, we may value the account maintained by such Custodian as of the close of the last day of the Custodian's reporting or statement date most recently ended on or before the close of the period for which Management Fees are calculated, as we shall select on a consistent basis for each Custodian.

Deduction of Fees from Custodial Account

The Advisory Agreement authorizes and directs the Custodian to deduct the combined Management Fees directly from the Account upon receipt of our instructions. We require clients to authorize the Custodian to deduct the Management Fees from the account and pay us directly. Clients are not generally permitted to choose to have Management Fees billed directly to them for payment in lieu of billing the Custodian; however, this term may be negotiable at our sole discretion. The amount of the Management Fee deducted by the Custodian will be reflected on the Custodian's regular statements to the Client.

Additional Fees & Expenses

The Management Fees are separate and distinct from a number of other expenses that Accounts will incur. These expenses include:

- Brokerage and Investment Expenses
- Investment Company Expenses
- Custodial Expenses

Brokerage and Investment Expenses

Accounts will generally invest in a portfolio of individual stocks or certificates of deposit and bonds. Additionally, accounts may be short options. Although many of these investments incur no load fees, clients should expect that their Account will incur some or all of the Brokerage and Investment Expenses described below.

Depending on the types of investments and the investment strategy employed, the Brokerage and Investment Expenses can be higher or lower, with investments in individual securities, such as stocks, options, or bonds, causing the costs to increase. Clients should be sure to discuss with an Alta Via Capital representative the investment strategy he/she intends to follow, whether it involves frequent buying and selling of securities, and the anticipated costs of such transactions. Your account will pay transaction-related fees for each transaction, and for some transactions, it will also pay other costs that could significantly increase your overall expenses and decrease any profits from these programs. Following are examples of some of the types of fees and expenses that are included in the Brokerage and Investment Expenses:

- Broker-dealers charge a commission, sales charge, or ticket charge for each transaction, plus a transaction fee for all transactions, except purchases involving mutual funds designated as Non-Transaction Fee funds
- Per-trade principal trade mark-up/mark-downs, stock exchanges, electronic communications networks, and other trading intermediaries involved in executing account transactions to buy or sell securities;
- Odd lot charges, transfer and other taxes, floor brokerage fees, service, handling, delivery, and mailing fees, electronic wire transfer fees, currency exchange fees, margin interest, and other expenses related to investments made or assets held for the client's account; and
- Early redemption fees, excessive trading penalties, exchange fees, and surrender fees in connection with the purchase, exchange, or redemption of mutual funds and money market funds.

Investment Company Expenses

Mutual funds, money market funds, ETF's, and UIT's (each referred to as a "fund") deduct from their assets the internal management fees, operating costs, and investment expenses they incur to operate the fund. These internal expenses generally include recordkeeping fees, and transfer and sub-transfer agent fees, among others. All of these represent indirect expenses that are charged to the fund's shareholders.

Frequently, these internal expenses also include "Distribution Fees." These amounts are deducted from the fund's assets to compensate brokers who sell fund shares, as well as to pay

for advertising, printing and mailing prospectuses to new investors, and printing and mailing sales literature. Mutual fund internal expenses also commonly include "Shareholder Service Fees" which are amounts deducted from the fund's assets to pay the costs of responding to investor inquiries and providing investors with information about their accounts.

Distribution Fees and Shareholder Service Fees (sometimes referred to as "12b-1 Fees,") are calculated for each class of shares of a fund, and are calculated as a percentage of the total assets able to the share class. The 12b-1 Fees, investment management fees, and other ongoing expenses are described in the fund's prospectus Fee Table. These fees will vary from fund to fund and for different share classes of the same fund. You can use the prospectus Fee Tables to help compare the annual expenses of different funds.

Custodial Expenses

Clients must pay the cost of services provided by their Custodian for: (1) arranging for the receipt and delivery of securities that are purchased, sold, borrowed or loaned for the account; (2) making and receiving payments with respect to account transactions and securities; (3) maintaining custody of account securities; and (4) maintaining custody of cash, receiving dividends, and processing exchanges, distributions, and rights accruing to the client's account. The Custodian may be compensated through commissions or other transaction-based fees for securities transactions executed through the Custodian (or its affiliates) or by asset-based fees for investments settled into the Custodian's accounts, or both. The specific fees and terms of each Custodian's services are described in the client's separate Custodial Agreement.

Compensation from the Sale of Securities and Other Products

Neither Mr. Gaynor nor any supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Evaluate All Costs of Our Programs

When evaluating the overall costs and benefits of our investment programs, clients should consider not just our Management Fees, but also the potential Brokerage and Investment Expenses, the Mutual Fund and ETF Expenses, and the Custodial Expenses. Clients should consider carefully all of the direct and indirect fees and expenses of our services and the investment products we recommend to fully understand the total costs and assess the value of our services.

Purchases of Similar Products and Services from Other Firms

Clients can generally purchase similar investment products or services through other firms that are not affiliated with us. Our Management Fees and the other costs of our programs are possibly higher than amounts charged by other advisers or financial services firms for similar services and who may provide better performance or lower risk. Clients may also purchase mutual funds, or other investment products or services directly from mutual fund companies.

The products may be available on a low or "no-load" basis.

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

Alta Via Capital does not accept performance-based fees - that is, fees based on a share of capital gains on or capital appreciation of the assets of a client (such as a client that is a hedge fund or other pooled investment vehicle). Therefore, there are no conflicts of interest that Alta Via Capital may face by managing these accounts at the same time, to include any incentive to favor accounts for which Alta Via Capital receives a performance-based fee.

Item 7: Types of Clients

Alta Via Capital is a registered investment advisor firm that provides investment advisory services to high net worth individuals, Individuals (other than high net worth individuals), charitable organizations and corporations or other businesses (collectively referred to as "Clients").

Requirement for Opening Accounts (Minimum investment amount is \$100,000)

Alta Via Capital's fee range for its service is subject to negotiation and could vary depending upon various circumstances, including the scope of the services to be provided (the minimum fees and fee ranges for existing clients prior to current calendar year may differ from those indicated). However, Alta Via Capital may impose certain requirements for opening and/or maintaining an account, such as a minimum account size or minimum fees and fee ranges.

The minimum investment required by an individual investor client is generally \$100,000. Accounts below these minimums may be negotiable and accepted on an individual basis at Alta Via Capital's discretion. However, Alta Via Capital may from time to time establish, modify and waive account or investment minimums given special circumstances. Also please see Fees and Compensation above for further details on investment minimums.

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

Methods of Analysis

Alta Via Capital's securities analysis methods may include charting, fundamental analysis, technical analysis, and the use of cyclical analysis and monitoring of investment cycles and trends. Fundamental analysis includes but is not limited to analyzing company financial statements and health, its management and competitive advantages, its competitors and markets, the overall state of the economy, interest rates, production and overall earnings. Technical analysis includes forecasting the direction of prices through the study of past market data, primarily price and volume.

Material risks associated with fundamental and/or technical analysis may be that the stock price of a company is not necessarily reflective of or otherwise directly correlated to such factors when determining value.

As with most investment products, because investment portfolios include securities, investing in securities involves risk of loss that you as our client should be prepared to bear.

Investment Strategies

Dividend Aristocrat Covered Call -

- **Market Neutral** - seeks capital preservation using covered call strategy on proprietary list of stocks that belong to group known as Dividend Aristocrats
- **Alpha Strategy** - seeks capital appreciation using covered call strategy on proprietary list of stocks that belong to group known as Dividend Aristocrats

QF Strategies - Small-Cap Growth - seeks capital appreciation consisting of equities selected from fastest growing companies in small-cap space with attractive upside potential and reasonable valuations relative to their growth profile.

QF Strategies - Small/Mid-Cap Growth - seeks capital appreciation consisting of equities selected from fastest growing companies in small/mid-cap space with attractive upside potential and reasonable valuations relative to their growth profile.

QF Strategies - Large-Cap Growth - seeks capital appreciation consisting of equities selected from fastest growing companies in large-cap space with attractive upside potential and reasonable valuations relative to their growth profile.

QF Strategies - Concentrated Equity Growth - seeks capital appreciation consisting of equities selected from fastest growing companies in all market capitalizations utilizing concentrated positions with attractive upside potential and reasonable valuations relative to their growth profile.

QF Strategies - All-Cap Growth - seeks capital appreciation consisting of equities selected from fastest growing companies in all market capitalizations with attractive upside potential and reasonable valuations relative to their growth profile.

QF Strategies - Large-Cap Dividend - seeks capital appreciation and attractive dividend yield coupled with solid fundamentals selected from large-cap dividend paying companies with attractive upside potential.

QF Strategies - Balanced/Custom Tailored Accounts - seeks a combination of asset allocation portfolio depending on client risk and preference.

In the event that Alta Via Capital employs a frequent trading strategy for its clients, it is important to note that such a strategy can have an effect on investment performance, particularly through increased brokerage and other transaction costs and taxes.

Alta Via Capital does not recommend any particular type of security as part of its overall investment advisory services.

Equity Risks

The material risks associated with these strategies are:

Equity Market Risk

Overall stock market risks may affect the value of the investments in equity strategies. Factors such as U.S. economic growth and market conditions, interest rates, and political events affect the equity markets.

Management Risk

Our judgments about the attractiveness, value and potential appreciation of a particular asset class or individual security may be incorrect and there is no guarantee that individual securities will perform as anticipated. The value of an individual security can be more volatile than the market as a whole or our intrinsic value approach may fail to produce the intended results. Our estimate of intrinsic value may be wrong or even if our estimate of intrinsic value is correct, it may take a long period of time before the price and intrinsic value converge.

Small and Mid-Cap Company Risk

Investments in small- and mid-cap companies may be riskier than investments in larger, more established companies. The securities of these companies may trade less frequently and in smaller volumes than securities of larger companies. In addition, small- and mid-cap companies may be more vulnerable to economic, market and industry changes. Because smaller companies may have limited product lines, markets or financial resources, or may depend on a few key employees, they may be more susceptible to particular economic events or competitive factors than larger capitalization companies.

Short Sale Risk

Short sales are speculative transactions and involve special risks. In order to initiate a short position, a security must be borrowed. Strategies that execute short sales may incur a loss if the price of the security sold short increases in value between the date of the short sale and the date when we purchase the security to replace the borrowed security. Losses are potentially unlimited in a short sale transaction.

Fixed Income Risks

The material risks associated with this strategy are:

Fixed Income Market Risk

Fixed income securities increase or decrease in value based on changes in interest rates. If rates increase, the value of fixed income securities generally declines. On the other hand, if rates fall, the value of the fixed income securities generally increases.

Management Risk

Our judgments about the attractiveness, value, and potential appreciation of a particular asset class or individual security may be incorrect and there is no guarantee that individual securities will perform as anticipated. The value of an individual security can be more volatile than the market as a whole, and our intrinsic value approach may fail to produce the intended results.

Credit Risk

There is a risk that issuers and counterparties will not make payments on the securities they issue. In addition, the credit quality of securities may be lowered if an issuer's financial condition changes. Lower credit quality may lead to greater volatility in the price of a security which may affect liquidity and our ability to sell the security.

Real Estate Risk

Real Estate Investment Trusts (REITS), although not a direct investment in real estate, are subject to the risks associated with investing in real estate. The value of these securities will rise and fall in response to many factors including economic conditions, the demand for rental property and changes in interest rates.

Structured Instrument Risk

Structured instruments may be less liquid than other debt securities, and the price of structured instruments may be more volatile. Although structured instruments may be sold in the form of a corporate debt obligation, they may not have some of the protection against counterparty default that may be available with publicly traded debt securities.

ETF Risks

The material risks associated with this strategy are:

International Limitations

While the U.S. has a plethora of ETF products, some countries only have a few exchange-traded funds in which to invest. Those regions that do offer market ETFs usually only include large-cap products leaving a lack of mid- and small-sized funds.

Low Trading Volumes

When ETFs have low trading volumes, the advantage of purchasing an ETF over an index or an equity diminishes. The bid-ask spread can be too wide to be cost-effective. Market Makers tend to be tighter on securities that are more liquid (barring any unforeseen news or circumstances).

Long Investment Horizon

The intraday trading opportunities created by ETFs may not fit into a long-term investor's strategy. This is more of an advantage for short-term ETF traders. As an investor, it will be important to layout your investing goals before you decide how to include ETFs in your portfolio.

Inactivity

Some ETFs aren't as actively traded as others. It can be a sector-related issue or even a regional issue. When this situation occurs, it may be more effective to invest in a managed fund where activity is higher.

Tax Implications

In the case of foreign ETFs, sometimes there may be a tax advantage by opting to invest in an international portfolio. Tax laws vary from country to country, so it may be beneficial for your tax return to find other foreign investments.

There are many benefits to including ETFs in your portfolio, however it is important to understand that they are not the ideal investment for every situation. ETFs should be evaluated on a case-by-case basis for every investing strategy.

Item 9: Disciplinary Information

Disclosure Events

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Alta Via Capital or its management personnel are involved.

There are no disclosure events involving an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Alta Via Capital or its management personnel are involved.

There are no disclosure events involving a self-regulatory organization (SRO) proceeding in which Alta Via Capital or its management personnel are involved.

Item 10: Other Financial Industry Activities or Affiliations

Broker/Dealer Affiliation

Neither Alta Via Capital nor any of its management persons are registered, or have an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Neither Mr. Gaynor nor any related persons have any relationship or arrangement material to the advisory business (e.g. Broker-dealer, municipal securities dealer or government securities dealer or broker, investment company or other pooled investment vehicle including mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," offshore fund, other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, and/or sponsor or syndicator of limited partnerships).

Neither Mr. Gaynor nor any related persons recommends or selects other investment advisors for clients for compensation directly or indirectly from those advisors that would create a conflict of interest.

On occasion, Alta Via Capital and its management persons may own securities products that they also recommend to clients which may present a potential conflict of interest. However, as a preventative measure, all client transactions will be conducted and implemented before any such transaction relating to any personal accounts of any affiliated persons of Alta Via Capital. In addition to this measure, all of the aforementioned management persons of Alta Via Capital will act in accordance with applicable securities laws and conduct their business to ensure overall compliance with Insider Trading rules and the Securities Fraud Enforcement Act of 1988.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding the Advisor, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

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

Code of Ethics

Alta Via Capital's Code of Ethics is designed and based upon the principle that Alta Via Capital and its employees owe a fiduciary duty to clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm, and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The purpose of Alta Via Capital's Code of Ethics is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading, and other forms of prohibited or unethical business conduct. As such, Alta Via Capital and its employees are prohibited from engaging in fraudulent, deceptive, or manipulative conduct. Alta Via Capital and its employees have an affirmative duty of utmost good faith to act solely in the best interest of its clients.

Alta Via Capital has adopted the following Code of Ethics in accordance with state requirements:

Fiduciary Responsibility - Alta Via Capital and its staff shall exercise the highest standard of care in protecting and promoting the interests of its clients, and will provide a written disclosure containing any conflicts of interest that may compromise their impartiality or independence. As fiduciary, Alta Via Capital shall not accept any referral fees or compensation that is contingent upon the purchase or sale of any financial product.

- Integrity - All professional services shall be rendered with the highest level of integrity.
- Objectivity - Alta Via Capital and its staff shall provide advice that is objective and in the best interest of the client and without conflicts of interest.
- Competence - Alta Via Capital and its staff shall maintain the necessary knowledge and skills to provide our clients with competent advice and services.
- Fairness - All professional services shall be performed by Alta Via Capital and its staff in a manner that is fair and reasonable to its clients.
- Confidentiality - Alta Via Capital and its staff shall maintain and safeguard all confidential client information in accordance with applicable laws.
- Diligence - Alta Via Capital and its staff shall ensure the accuracy and completeness of records, information, and data collected, used and managed, and will take necessary steps to correct any discrepancies.

Regulatory Compliance - Alta Via Capital and its staff shall comply fully with appropriate laws and internal regulations.

Alta Via Capital will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Firm Interest in Client Transactions

Neither Alta Via Capital nor any of its related persons will buy securities for itself/themselves from advisory clients, or sell securities Alta Via Capital or its related persons own to advisory clients (principal transactions).

Alta Via Capital or its related persons may buy or sell for itself/themselves securities that Alta Via Capital or its related persons also recommend to advisory clients.

Neither Alta Via Capital nor any of its related persons will recommend purchase of securities to advisory clients for which Alta Via Capital or any related person serves as underwriter, general or managing partner, or purchaser representative.

Neither Alta Via Capital nor any of its related persons will recommend purchase or sale of securities to advisory clients for which Alta Via Capital or any related person has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer).

Item 12: Brokerage Practices

For accounts that it has authority to recommend or place trades, Alta Via Capital recommends that client accounts be held at Interactive Brokers Group, Inc. (IB) or Charles Schwab (CS) to provide custody and brokerage services to their clients. Alta Via Capital maintains a fiduciary duty to seek best execution for client transactions. This does not solely mean the achievement of the best price on a given transaction. Rather, it is a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client.

IB and CS provide clients of Alta Via Capital with reduced trading fees, online-access to their accounts and a well-staffed, United States-based customer service department available via telephone. In addition, IB and CS waive all account custody fees for advisory clients. While Alta Via Capital does not have any formal soft dollar arrangements, as a direct benefit to Alta Via Capital employees, IB and CS provide third-party and proprietary research on securities and online instructional webcasts for continuing education purposes. Clients should be aware, however, that the receipt of economic benefits by Alta Via Capital creates a conflict of interest and may indirectly influence the firm's recommendation of IB or CS custody and brokerage services. Further, while there may be an incentive for Alta Via Capital to use IB or CS as custodians, other broker-dealer custodians under consideration offered similar benefits with comparable trading fees.

Some clients may have a pre-existing relationship with a broker and will instruct Alta Via Capital to execute all transactions through that broker. In such cases, it should be understood that Alta Via Capital may not have authority to negotiate commissions or obtain volume discounts and

best execution may not be achieved. When the client chooses the broker, there may be a disparity between the commissions a client pays and those paid by clients who do not direct us to use a broker or those clients who direct us to use different brokers.

From time to time, Alta Via Capital may aggregate trades together for multiple client accounts, most often when these accounts are being directed to buy or sell the same securities at the same time. If such an aggregated trade is not completely filled, Alta Via Capital will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis.

Research and Other Soft Dollar Benefits

Regarding research and other soft dollar benefits, Alta Via Capital does not receive research (both proprietary and nonproprietary) or other products or services other than execution services from a broker/dealer or a third party in connection with client securities transactions (otherwise known as "soft dollar benefits").

Brokerage for Client Referrals

Neither Mr. Gaynor nor any related persons receives client referrals from any broker-dealers or third parties.

Item 13: Review of Accounts

Accounts are reviewed on an ongoing basis. Overall investment management, market prospects and individual issue prospects are considered in the review process. Triggering factors that may affect an account review could be any material change in a client's account such as a change in company earnings, industry/company outlook as well as other economic factors. All account reviews are conducted by Alta Via Capital compliance. All clients are encouraged to conduct an annual review of their financial objectives, account performance as well other relevant factors.

The nature and frequency of reports are determined by client need and the services offered. Clients are provided with transaction confirmation notices and regular summary account statements sent directly from the designated broker-dealer/custodian for each client account. Clients with Managed Account Services will receive written quarterly reports summarizing their overall account activity and investment performance.

Item 14: Client Referrals and Other Compensation

Receipt of Economic Benefit (non-client)

Alta Via Capital does not receive an economic benefit for providing investment advice or other advisory services from someone who is not a client.

Neither Mr. Gaynor nor any related persons directly or indirectly compensates any person who is not a supervised person for client referrals.

Item 15: Custody

Alta Via Capital does not maintain custody of client funds and/or securities. Therefore, clients will receive their monthly and/or quarterly account statements directly from the designated broker/dealer, bank or other qualified custodian of record and therefore should carefully review those statements for accuracy. In the event that clients also receive account statements from Alta Via Capital, it strongly encourages each client to compare the account statements they receive from the qualified custodian with those received from Alta Via Capital.

Advisor will have no authority to withdraw or transfer assets from Client's account (except to a destination pre-set by the client and in accordance with Client's specific instructions to Advisor).

Fee Deduction

The investment advisor has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee. The investment advisor has written authorization from the client to deduct advisory fees from the account held with the qualified custodian. Each time a fee is directly deducted from a client account, the investment advisor concurrently:

- Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and or
- Reviews amounts that custodian is preauthorized to calculate and to credit the advisor's account.

Item 16: Investment Discretion

Upon receiving written authorization from a client, Alta Via Capital may manage client assets on a limited discretionary basis. In this case, Client delegates to Alta Via Capital limited discretionary trading authorization with respect to the purchase, exchange and sale of actively traded equity and equity-related securities in addition to the amount of securities to be bought or sold on behalf of the Client. Clients may also hereby appoint one or more advisory representatives of Alta Via Capital as a representative of Alta Via Capital as agent and attorney in fact to purchase, sell and trade such securities, waivers, consents and other instruments with respect to such securities.

Item 17: Voting Client Securities

Alta Via Capital does not have the authority to vote client proxies and therefore is not required to take action or render advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which assets of the clients account(s) may be invested from time to time. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent. Clients may contact Alta Via Capital directly at (925) 828-1274 if they have any questions regarding a particular solicitation.

Item 18: Financial Information

Prepayment of Fees

Alta Via Capital does not require or solicit prepayment of fees.

Material Impact of Discretionary Authority

Alta Via Capital may exercise discretionary authority over certain client funds or securities. However, Alta Via Capital does not anticipate any financial condition that may be reasonably likely to impair its ability to meet contractual commitments to clients at this time.

Custody Disclosure

Alta Via Capital does not have custody of client funds or securities. Please see the Custody section above for further details.

Bankruptcy Disclosure

Alta Via Capital has not been the subject of a bankruptcy petition at any time since its inception.

Item 19: Requirements of State-Registered Advisers

Executive Officers and Management Persons

The following is a list of all principal executive officers and management persons, including their formal education and business background information:

Name: Carl Gabler, Managing Director QF Strategies

Date of Birth: 1972

Education: University of California, Santa Barbara – Bachelor of Arts, Business Economics with an emphasis in Accounting (1995)

Background:

Alta Via Capital, Managing Director QF Strategies, 2/20 - Present

Insight Wealth Strategies, LLC, Portfolio Manager, Head Trader, 4/18 - 2/20

Insight Wealth Strategies, Portfolio Manager, Head of Portfolio Execution, 1/18 - 4/18

Insight Capital Research & Management, Inc., Head Equity Trader, 1/96 - 12/17

Name: Patrick Gaynor, President

Date of Birth: 1964

Education: University of Southern California - Bachelors of Science Accounting (1987); Indiana University – Masters in Business Administration, Finance

Background:

Alta Via Capital, President 01/18 – Present

PTRC Investments, Non-RIA Consultant 4/15 – 12/17

Crown Capital Management, Portfolio Manager 2/08 - 3/15

PTR Partners, LLC, General Partner, 1/02 - 12/07

Lonestar Partners, Research Analyst & CFO, 6/98 - 12/01

Name: Dragos Georgescu, Managing Director QF Strategies

Date of Birth: 1979

Education: San Jose State University - Bachelors of Science in Economics (2002); San Jose State University – Masters of Arts in Economics (2004); Golden Gate University - Masters of Finance (2006)

Background:

Alta Via Capital, Managing Director QF Strategies, 10/19 - Present

Insight Wealth Strategies, LLC, Portfolio Manager, 04/18 - 10/19

Insight Wealth Strategies, Portfolio Manager, 12/17 - 04/18

Insight Capital Research & Management Inc, Portfolio Manager & Equity Analyst, 02/11 - 12/17

Cambria Capital, VP of Investment Research, 12/09 - 02/11

Sierra Tech Research, Securities Analyst, 11/05 - 12/09

Polestar Investment Research, Equity Research Associate, 06/05-11/05

All material facts involving disclosure events for management persons are previously disclosed above in Item 9 Disciplinary Information.

All relationships or arrangements involving management persons are previously disclosed above in Item 10 Other Financial Industry Activities and Affiliations and Item 12 Brokerage Practices.

Item 20: Additional Information

Privacy Policy Notice

Alta Via Capital recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Alta Via Capital will not disclose your personal information to anyone unless it is required by law or at your direction. We shall not sell your personal information. Alta Via Capital will provide the privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect it responsibly.

What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, email address, phone number, social security number, date of birth, and background/financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

Why We Collect Your Information

We gather information about you so that we can:

- create, maintain, customize, and secure your account with us;
- process your requests, transactions, payments and prevent transactional fraud;
- help design and implement the investment and planning related services we provide you;
- comply with the Federal and State laws and regulations that govern us.

What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our clearing firm. If the Financial Adviser leaves Alta Via Capital to join another firm, he or she may be permitted to retain copies of client information so that they can assist with the transfer of client accounts and continue to serve the client at their new firm.

Alta Via Capital will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies not affiliated with Alta Via Capital will be subject to confidentiality agreements.

How We Protect Your Personal Information

Privacy has always been important to Alta Via Capital. We restrict and limit access to client information only to those who need to carry out their business functions. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.

Business Continuity Plan & Information Security Programs

Alta Via Capital has developed business continuity and information security programs that are regularly reviewed by compliance and information technology professionals in light of both current best practices and applicable regulations. Clients may obtain a copy of Alta Via Capital's Business Continuity Disclosure upon request.

Form ADV Part 2B Brochure Supplement
Dated June 12, 2020

Alta Via Capital

Item 1

A.

Patrick Gaynor
Alta Via Capital
4125 Hopyard Road Suite 225, Pleasanton, CA 94588
Telephone: (925) 828-1274
patrick@altavia-capital.com
May 13, 2020

B.

This brochure supplement provides information about the Supervised Persons listed above that supplement Alta Via Capital's brochure. You should have received a copy of that brochure.

Please contact Patrick Gaynor at (925)437-2412 or via email at patrick@altavia-capital.com if you did not receive Alta Via Capital's brochure or if you have any questions about the contents of this supplement.

Additional information about Alta Via Capital is also available on the California Department of Business Oversight's website at www.dbo.ca.gov.

Item 2 Educational Background and Business Experience

Alta Via Capital requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. Alta Via Capital requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations.

Name: Patrick Gaynor Date of Birth: 1964

Education: University of Southern California - Bachelors of Science Accounting (1987); Indiana University – Masters in Business Administration, Finance (1998)

Background:

Alta Via Capital, President, 01/18 – Present

PTRC Investments, Non-RIA Consultant 4/15 – 12/17

Crown Capital Management, Portfolio Manager, 02/08 - 03/15 PTR Partners, LLC, General Partner, 01/02 - 12/07

Lonestar Partners, Research Analyst & CFO, 6/98 - 12/01

Item 3: Disciplinary Information

None.

Item 4: Other Business Activities

Other Related Investment Business

Patrick Gaynor is not actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker/dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA.

Other Business Activity

All material conflicts of interest are disclosed regarding IARs and/or Alta Via Capital which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 5: Additional Compensation

None.

Item 6: Supervision

Designated Supervisor

Patrick Gaynor is the designated supervisor for Alta Via Capital responsible for providing supervisory oversight regarding Alta Via Capital's advisory business. Mr. Gaynor's contact information is (925) 437-2412. All supervision is performed on a regular and continuous basis where all transactional activity is reviewed and approved by Mr. Gaynor.

Item 7: Requirements for State Registered Advisors

Disclosure Events

Patrick Gaynor has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages or found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 1

A.

Carl Gabler
Alta Via Capital
4125 Hopyard Road Suite 225, Pleasanton, CA 94588
Telephone: (925) 828-1274
carl@altavia-capital.com
May 13, 2020

B.

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Name: Carl Gabler

Date of Birth: 1972

Education: University of California, Santa Barbara – Bachelor of Arts, Business Economics with an emphasis in Accounting (1995)

Background:

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Insight Wealth Strategies, Portfolio Manager, Head of Portfolio Execution, 1/18 - 4/18
Insight Capital Research & Management, Inc., Head Equity Trader, 1/96 - 12/17

Item 3: Disciplinary Information

None.

Item 4: Other Business Activities

Other Related Investment Business

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Item 5: Additional Compensation

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Item 6: Supervision**Designated Supervisor**

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Item 7: Requirements for State Registered Advisors**Disclosure Events**

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Item 1

A.

Dragos Georgescu
Alta Via Capital
4125 Hopyard Road Suite 225, Pleasanton, CA 94588
Telephone: (925) 828-1274
dragos@altavia-capital.com
May 13, 2020

B.

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Name: Dragos Georgescu

Date of Birth: 1979

Education: San Jose State University - Bachelors of Science in Economics (2002); San Jose State University - Masters of Arts in Economics (2004); Golden Gate University - Masters of Finance (2006)

Background:

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Cambria Capital, VP of Investment Research, 12/09 - 02/11

Sierra Tech Research, Securities Analyst, 11/05 -12/09

Polestar Investment Research, Equity Research Associate, 06/05-11/05

Item 3: Disciplinary Information

None.

Item 4: Other Business Activities

Other Related Investment Business

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