

**FORM ADV PART 2A
DISCLOSURE BROCHURE**

Alta Via Capital

Office Address:
4695 Chabot Drive
Suite 200
Pleasanton, CA 94588

Tel: 925-694-0090

Tammy@altavia-capital.com

Website:
www.altavia-capital.com

This brochure provides information about the qualifications and business practices of Alta Via Capital. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 925-694-0090. 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 Alta Via Capital (CRD #289739) is available on the SEC's website at www.adviserinfo.sec.gov

**MARCH 12,
2024**

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This update is in accordance with the required annual update for investment advisors. Since the last filing of this brochure on March 14, 2023, the following updates have been made:

- Item 4 has been updated to reflect a recent asset under management calculation.
-

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

Item 1: Cover Page

Item 2: Material Changes ii

Annual Update ii

Material Changes since the Last Update..... ii

Full Brochure Available..... ii

Item 3: Table of Contents..... iii

Item 4: Advisory Business 1

Firm Description 1

Types of Advisory Services 1

Client Tailored Services and Client Imposed Restrictions..... 4

Wrap Fee Programs 4

Client Assets under Management 4

Item 5: Fees and Compensation 4

Method of Compensation and Fee Schedule..... 4

Client Payment of Fees 6

Additional Client Fees Charged..... 6

Prepayment of Client Fees 6

External Compensation for the Sale of Securities to Clients..... 6

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

Sharing of Capital Gains 6

Item 7: Types of Clients 6

Description 6

Account Minimums 6

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss 7

Methods of Analysis..... 7

Investment Strategy 7

Security Specific Material Risks..... 8

Item 9: Disciplinary Information..... 11

Criminal or Civil Actions 11

Administrative Enforcement Proceedings 11

Self- Regulatory Organization Enforcement Proceedings	11
Item 10: Other Financial Industry Activities and Affiliations	11
Broker-Dealer or Representative Registration	11
Futures or Commodity Registration	11
Material Relationships Maintained by this Advisory Business and Conflicts of Interest	11
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Code of Ethics Description	11
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest	12
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest	12
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	12
Item 12: Brokerage Practices	13
Factors Used to Select Broker-Dealers for Client Transactions	13
Aggregating Securities Transactions for Client Accounts	14
Item 13: Review of Accounts	14
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved	14
Review of Client Accounts on Non-Periodic Basis	14
Content of Client Provided Reports and Frequency	14
Item 14: Client Referrals and Other Compensation	14
Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest	14
Advisory Firm Payments for Client Referrals	14
Item 15: Custody	15
Account Statements	15
Item 16: Investment Discretion	15
Discretionary Authority for Trading	15
Item 17: Voting Client Securities	15
Proxy Votes	15
Item 18: Financial Information	16
Balance Sheet	16
Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients	16

Bankruptcy Petitions during the Past Ten Years.....	16
Item 19: Requirements for State Registered Advisors	16
Principal Executive Officers and Management Persons	16
Outside Business Activities.....	16
Performance Based Fee Description.....	16
Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons.....	16
Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities.....	17
Material Conflicts of Interest Assurance.....	17
Principal Executive Officer – Patrick Gaynor	19
Item 2 - Educational Background and Business Experience	19
Item 3 - Disciplinary Information	19
Item 4 - Other Business Activities.....	20
Item 5 - Additional Compensation.....	20
Item 6 - Supervision	20
Item 7 - Requirements for State-Registered Advisors	20
Carl Gabler.....	22
Item 2 - Educational Background and Business Experience	22
Item 3 - Disciplinary Information	22
Item 4 - Other Business Activities.....	23
Item 5 - Additional Compensation.....	23
Item 6 - Supervision	23
Item 7 - Requirements for State-Registered Advisors	23
Dragos Georgescu.....	25
Item 2 - Educational Background and Business Experience	25
Item 3 - Disciplinary Information	25
Item 4 - Other Business Activities.....	26
Item 5 - Additional Compensation.....	26
Item 6 - Supervision	26
Item 7 - Requirements for State-Registered Advisors	26

Item 4: Advisory Business

Firm Description

Alta Via Capital (“Alta Via Capital”) was founded in 2013 and became registered to offer investment advisory services in 2018. Patrick Gaynor is 100% owner. Under CCR Section 260.238(k), Alta Via Capital, its representatives or any of its employees will disclose to Clients all material conflicts of interest.

Types of Advisory Services

ASSET MANAGEMENT

Alta Via Capital offers discretionary asset management services to advisory Clients. Alta Via Capital will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize Alta Via Capital discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Alta Via Capital offers the following strategies for Clients:

- Dividend Aristocrat Covered Call – Market Neutral
- Dividend Aristocrat Covered Call – Alpha Strategy
- QF Strategies – Corporate Confidence 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
- Custom/Asset Allocation

SUBADVISORY SERVICES

Alta Via Capital may act as a sub-advisor to other non-affiliated investments advisors (Primary Advisor) who hire us to manage a portion or all of a client’s portfolio. The Primary Advisor must have discretionary authority over the account and the ability to delegate that discretionary trading authority to Alta Via Capital. Alta Via Capital will manage the assets according to agreed upon strategies between Alta Via Capital and the Primary Advisor.

ERISA PLAN SERVICES

Alta Via Capital provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. Alta Via Capital may act as a 3(21) or 3(38) advisor.

Limited Scope ERISA 3(21) Fiduciary. Alta Via Capital may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor Alta Via Capital has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made

in their plan, though using Alta Via Capital can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. Alta Via Capital acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands Alta Via Capital's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, Alta Via Capital is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. Alta Via Capital will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Alta Via Capital may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Alta Via Capital and Client.

3. Alta Via Capital has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;

- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Alta Via Capital on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

ERISA 3(38) Investment Manager. Alta Via Capital can also act as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan's assets. Alta Via Capital would then become solely responsible and liable for the selection, monitoring and replacement of the plan's investment options.

1. Fiduciary Services are:

- Alta Via Capital has discretionary authority and will make the final decision regarding the initial selection, retention, removal and addition of investment options in accordance with the Plan's investment policies and objectives.
- Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan.
- Provide discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the Alta Via Capital's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the Alta Via Capital is not providing fiduciary advice as defined by ERISA to the Plan participants. Alta Via Capital will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Alta Via Capital may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Alta Via Capital and Client.

3. Alta Via Capital has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);

- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Adviser on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

Alta Via Capital does not sponsor any wrap fee programs.

Client Assets under Management

Alta Via Capital has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$80,495,641	\$0	December 31, 2023

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

Alta Via Capital offers discretionary direct asset management services to advisory Clients. Pursuant to CCR Section 260.238(j), lower fees for comparable services may be available from other sources. Total fees to Client will never exceed the safe harbor threshold of 3% of assets under management per year. Alta Via Capital charges an annual investment advisory fee based on the investment strategy selected as follows:

Strategy	Annual Fee
Dividend Aristocrat Covered Call – Market Neutral	1%
Dividend Aristocrat Covered Call – Alpha Strategy	1%
QF Strategies – Corporate Confidence 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%
Custom/Asset Allocation	1%

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After five (5) business days, the Client may cancel by providing written notice to Alta Via Capital and Alta Via Capital may terminate advisory services with thirty (30) days written notice to the Client. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Alta Via Capital. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

SUBADVISORY SERVICES FEES

A fee of no greater than 2.00% will be charged on the total assets under management that the third party unaffiliated investment adviser brings to Alta Via Capital. Alta Via Capital is compensated directly by the third party unaffiliated investment adviser with a portion of their investment management fee, as per the duly executed Sub-Advisory services agreement. The third party unaffiliated investment adviser who engages Alta Via Capital as a Sub-advisor shall be responsible for billing its Clients and collecting all fees.

Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Alta Via Capital. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 1%. The annual fee is negotiable and will be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, Alta Via Capital shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of Alta Via Capital for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. Alta Via Capital does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Alta Via Capital will disclose this compensation, the services rendered, and the payer of compensation. Alta Via Capital will offset the compensation against the fees agreed upon under the Agreement.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing or they may pay Alta Via Capital directly. The Client must consent in advance to direct debiting of their investment account.

Fees for ERISA services will either be deducted from Plan assets or paid directly to Alta Via Capital. The Client must consent in advance to direct debiting of their investment account.

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Alta Via Capital does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Alta Via Capital. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Alta Via Capital does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for ERISA 3(21) and/or 3(38) services may be billed in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Alta Via Capital.

External Compensation for the Sale of Securities to Clients

Alta Via Capital does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of Alta Via Capital.

Item 6: Performance-Based Fees and Side-by-Side Management**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Alta Via Capital does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Alta Via Capital to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients**Description**

Alta Via Capital generally provides investment advice to individuals and high net worth individuals.

Client relationships vary in scope and length of service.

Account Minimums

Alta Via Capital requires a minimum account balance of \$100,000 to open an account. In certain instances, the minimum account size may be lowered or waived.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Alta Via Capital. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Alta Via Capital offers the following investment strategies:

- Dividend Aristocrat Covered Call – Market Neutral – seeks capital preservation using covered call strategy on proprietary list of stocks that belong to a group known as Dividend Aristocrats.
- Dividend Aristocrat Covered Call – Alpha Strategy - seeks capital appreciation using covered call strategy on proprietary list of stocks that belong to a group known as Dividend Aristocrats.
- QF Strategies – Corporate Confidence Strategy - seeks capital appreciation consisting of equities selected from all market capitalizations experiencing

significant corporate insider buying or positive change in overall insider ownership. Companies also have solid fundamentals and attractive upside potential.

- 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.
- Custom/Asset Allocation – seeks a combination of asset allocation portfolio depending on client risk and preference.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investing in securities involves risk of loss that clients should be prepared to bear. Investors face the following investment risks and should discuss these risks with Alta Via Capital:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that

underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- *Foreign Investment Risk:* Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.

- *Preferred stock:* One risk of preferred stocks is that shares are often sensitive to changes in interest rates. Investors in these vehicles don't enjoy the same voting rights as common shareholders.
- *Bonds:* The risks associated with bonds include the inverse relationship between interest rates and bond prices. As interest rates fall, bond prices rise. Conversely, when interest rates rise, bond prices tend to fall. Investors must also be aware of credit/default risk. Corporate bonds aren't guaranteed by the full faith and credit of the U.S. government, but instead depend on the issue's ability to repay the debt.

Item 9: Disciplinary Information

Criminal or Civil Actions

Alta Via Capital and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Alta Via Capital and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Alta Via Capital and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of Alta Via Capital or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Alta Via Capital is not registered as a broker-dealer and no affiliated representatives of Alta Via Capital are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Alta Via Capital nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

President Patrick Gaynor has no financial affiliated business to disclose.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Alta Via Capital does not select or recommend other investment advisors.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of Alta Via Capital have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Alta Via Capital affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Alta Via Capital. The Code reflects Alta Via Capital and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Alta Via Capital's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Alta Via Capital may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Alta Via Capital's Code is based on the guiding principle that the interests of the Client are our top priority. Alta Via Capital's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Alta Via Capital will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Alta Via Capital and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Alta Via Capital and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Alta Via Capital with copies of their brokerage statements.

The Chief Compliance Officer of Alta Via Capital is Patrick Gaynor. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Alta Via Capital does maintain a firm proprietary trading account and affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, the firm and affiliated persons are required to disclose all reportable securities transactions as well as provide Alta Via Capital with copies of their brokerage statements.

The Chief Compliance Officer of Alta Via Capital is Patrick Gaynor. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Alta Via Capital will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Alta Via Capital will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Alta Via Capital relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Alta Via Capital. Alta Via Capital does not receive any portion of the trading fees.

Alta Via Capital will recommend the use of Interactive Brokers, Charles Schwab & Co., Inc., or UBS.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Alta Via Capital from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Alta Via Capital has no formal soft dollar arrangements, Alta Via Capital may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, Alta Via Capital receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Alta Via Capital. Alta Via Capital cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. Alta Via Capital does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Alta Via Capital receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Alta Via Capital has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

Alta Via Capital does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*

In circumstances where a Client directs Alta Via Capital to use a certain broker-dealer, Alta Via Capital still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: Alta Via Capital's inability to negotiate commissions or to obtain volume discounts, there may be a disparity in commission charges among Clients and conflicts of interest arising from brokerage firm referrals. The firm may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money.

Aggregating Securities Transactions for Client Accounts

Alta Via Capital is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Alta Via Capital. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of Alta Via Capital, Patrick Gaynor. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by Alta Via Capital's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Performance reports will be provided by Alta Via Capital at least quarterly to Clients with assets under management

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Alta Via Capital does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

Alta Via Capital does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Alta Via Capital.

Alta Via Capital is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Alta Via Capital. Pursuant to CCR Section 260.237(b)(3)

- A. The investment adviser 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.
- B. The investment adviser has written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
- C. Each time a fee is directly deducted from a Client account, the investment adviser concurrently:
 - i. Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
 - ii. Sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.
- D. The investment adviser notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided above. Such notification is required to be given on Form ADV.

Item 16: Investment Discretion

Discretionary Authority for Trading

Alta Via Capital requires discretionary authority to manage securities accounts on behalf of Clients. Alta Via Capital has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Alta Via Capital discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Alta Via Capital allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Alta Via Capital in writing.

Alta Via Capital does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

Alta Via Capital will vote proxies on behalf of a Client if, in its investment agreement with Alta Via Capital, the Client has delegated to Alta Via Capital the authority to vote proxies on

its behalf. Alta Via Capital has adopted and implemented policies and procedures (“Proxy Voting Procedures”) to ensure that, where it has voting authority, proxy matters are handled in the best interest of the Clients, in accordance with Alta Via Capital’s fiduciary duties.

Alta Via Capital has adopted procedures to implement the firm's policy and conducts reviews to monitor and ensure the firm's policy is observed, implemented properly and amended or updated, as appropriate. These policies and procedures, which are maintained in a separate document available upon request, include but are not limited to, the following:

- General Policies
- Disclosure to Third Parties
- Proxy Voting Designee
- Conflicts of Interest
- Recordkeeping and Disclosure

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because Alta Via Capital does not serve as a custodian for Client funds or securities and Alta Via Capital does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients

Alta Via Capital has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Alta Via Capital has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither Alta Via Capital nor its management receive performance-based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither Alta Via Capital nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;

- c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
- a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Material Conflicts of Interest Assurance

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

Item 1 Cover Page

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Patrick Gaynor

Alta Via Capital

Office Address:

4695 Chabot Drive
Suite 200
Pleasanton, CA 94588

Tel: 925-694-0090

Patrick@altavia-capital.com

Website:

www.altavia-capital.com

This brochure supplement provides information about Patrick Gaynor and supplements the Alta Via Capital brochure. You should have received a copy of that brochure. Please contact Patrick Gaynor if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Patrick Gaynor (CRD #4991936) is available on the SEC's website at www.adviserinfo.sec.gov.

MARCH 12, 2024

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Patrick Gaynor

- Year of birth: 1964
-

Item 2 - Educational Background and Business Experience

Educational Background:

- Indiana University; Master in Business Administration - Finance; 1998
- University of Southern California; Bachelor of Science – Accounting; 1987

Business Experience:

- Alta Via Capital; Investment Advisor Representative/Chief Compliance Officer; 02/2018-Present
 - Alta Via Capital; Consultant; 06/2014-Present
 - Alta Via Capital fka PTRC Investments; President; 03/2013-Present
 - Crown Capital Management; Portfolio Manager; 02/2008-03/2015
-

Item 3 - Disciplinary Information

- A. Mr. Gaynor has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Gaynor never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Gaynor has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Gaynor has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

President Patrick Gaynor has no other business activities to disclose.

Item 5 - Additional Compensation

Patrick Gaynor does not receive any additional compensation and he does not receive any performance-based fees. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Since Patrick Gaynor is the Chief Compliance Officer of Alta Via Capital and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at Patrick@altavia-capital.com or 925-694-0090.

Item 7 - Requirements for State-Registered Advisors

- A. Mr. Gaynor has not been involved in any of the following:
1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
- B. Mr. Gaynor has never been the subject of a bankruptcy petition.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Carl Gabler

Alta Via Capital

Office Address:

4695 Chabot Drive
Suite 200
Pleasanton, CA 94588

Tel: 925-694-0090

Carl@altavia-capital.com

Website:

www.altavia-capital.com

This brochure supplement provides information about Carl Gabler and supplements the Alta Via Capital brochure. You should have received a copy of that brochure. Please contact Carl Gabler if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Carl Gabler (CRD #2790353) is available on the SEC's website at www.adviserinfo.sec.gov.

MARCH 12, 2024

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Carl Gabler

- Year of birth: 1972
-

Item 2 - Educational Background and Business Experience

Educational Background:

- University of California, Santa Barbara; Bachelor of Arts – Business Economics with an emphasis in Accounting; 1995

Business Experience:

- Alta Via Capital; Managing Director; 02/2020-Present
 - Alta Via Capital; Investment Advisor Representative; 02/2020-Present
 - Insight Wealth Strategies, LLC; Portfolio Manager & Head Trader; 04/2018-02/2020
 - Insight Wealth Strategies, LLC; Investment Advisor Representative; 09/2018-02/2020
 - Lincoln Financial Advisors Corporation; Registered Representative; 04/2018-05/2018
 - Insight Wealth Strategies; Portfolio Manager & Head of Portfolio Execution; 01/2018-04/2018
 - Insight Capital Research & Management Inc; Head Equity Trader; 01/1996-12/2017
-

Item 3 - Disciplinary Information

- A. Mr. Gabler has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Gabler never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

- (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Gabler has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Gabler has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Carl Gabler has no other business activities to disclose.

Item 5 - Additional Compensation

Carl Gabler does not receive any additional compensation and he does not receive any performance-based fees. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Patrick Gaynor is the Chief Compliance Officer of Alta Via Capital. Mr. Gaynor reviews Carl Gabler's work through Client account reviews and quarterly personal transaction reports, as well as face-to-face and phone interactions. Patrick Gaynor can be reached at Patrick@altavia-capital.com or 925-694-0090.

Item 7 - Requirements for State-Registered Advisors

- A. Mr. Gabler has not been involved in any of the following:
1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
- B. Mr. Gabler has never been the subject of a bankruptcy petition.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Dragos Georgescu

Alta Via Capital

Office Address:
4695 Chabot Drive
Suite 200
Pleasanton, CA 94588

Tel: 925-694-0090

Dragos@altavia-capital.com

Website:
www.altavia-capital.com

This brochure supplement provides information about Dragos Georgescu and supplements the Alta Via Capital brochure. You should have received a copy of that brochure. Please contact Dragos Georgescu if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Dragos Georgescu (CRD #5073867) is available on the SEC's website at www.adviserinfo.sec.gov.

MARCH 12, 2024

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Dragos Georgescu

- Year of birth: 1979
-

Item 2 - Educational Background and Business Experience

Educational Background:

- Golden Gate University; Master of Science in Finance; 2006
- San Jose State University; Master of Arts in Economics; 2004
- San Jose State University; Bachelor of Science - Economics; 2002
- San Jose State University; Minor Degree- Mathematics; 2002
- San Jose State University; Minor Degree – Computer Science; 2001

Business Experience:

- Alta Via Capital; Managing Director; 10/2019 – Present
 - Alta Via Capital; Investment Advisor Representative; 10/2019- Present
 - Insight Wealth Strategies, LLC; Portfolio Manager; 04/2018-10/2019
 - Insight Wealth Strategies, LLC; Investment Advisor Representative; 04/2018-10/2019
 - Insight Wealth Strategies; Portfolio Manager; 12/2017-04/2018
 - Lincoln Financial Advisors Corporation; Registered Representative; 02/2018-05/2018
 - Lincoln Financial Advisors Corporation; Investment Advisor Representative; 12/2017-05/2018
 - Insight Capital Research & Management Inc; Portfolio Manager & Equity Analyst; 02/2011-12/2017
 - Insight Capital Research & Management Inc; Investment Advisor Representative; 05/2011-12/2017
-

Item 3 - Disciplinary Information

- A. Mr. Georgescu has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;

3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Georgescu never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Georgescu has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Georgescu has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Dragos Georgescu has no other business activities to disclose.

Item 5 - Additional Compensation

Dragos Georgescu does not receive any additional compensation and he does not receive any performance-based fees. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Patrick Gaynor is the Chief Compliance Officer of Alta Via Capital. Mr. Gaynor reviews Dragos Georgescu's work through Client account reviews and quarterly personal transaction reports, as well as face-to-face and phone interactions. Patrick Gaynor can be reached at Patrick@altavia-capital.com or 925-694-0090.

Item 7 - Requirements for State-Registered Advisors

- A. Mr. Georgescu has not been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
- B. Mr. Georgescu has never been the subject of a bankruptcy petition.