

**Item 1. Cover Page**

**BROCHURE OF  
ALTA SUMMIT CAPITAL, LLC D/B/A AGENTSMYTH ADVISORS**

A Delaware limited liability company registered with the Securities and Exchange Commission  
as an Investment Adviser (CRD # 330911)

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**THIS BROCHURE PROVIDES INFORMATION ABOUT THE QUALIFICATIONS AND BUSINESS PRACTICES OF ALTA SUMMIT CAPITAL, LLC D/B/A AGENTSMYTH ADVISORS. IF YOU HAVE ANY QUESTIONS ABOUT THE CONTENTS OF THIS BROCHURE, PLEASE CONTACT US AT (917) 826-9949.**

**THE INFORMATION IN THIS BROCHURE HAS NOT BEEN APPROVED OR VERIFIED BY THE U.S. SECURITIES AND EXCHANGE COMMISSION (“SEC”) OR ANY STATE SECURITIES AUTHORITY.**

**ALTA SUMMIT CAPITAL, LLC D/B/A AGENTSMYTH ADVISORS IS REGISTERED AS AN INVESTMENT ADVISER WITH THE SEC. REGISTRATION WITH THE SEC OR WITH ANY STATE SECURITIES REGULATOR DOES NOT IMPLY A CERTAIN LEVEL OF SKILL OR TRAINING.**

**ADDITIONAL INFORMATION ABOUT ALTA SUMMIT CAPITAL, LLC D/B/A AGENTSMYTH ADVISORS IS AVAILABLE ON THE SEC’S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV).**

The date of this brochure is

April 25, 2024

The delivery of this brochure (the “Brochure”) at any time does not imply that the information contained herein is correct as of any time subsequent to the date shown above.

**Item 2.        Material Changes**

This Item is not applicable as this Brochure is Alta Summit Capital, LLC d/b/a AgentSmyth Advisors' initial Form ADV Part 2A Brochure.

**Item 3. Table of Contents**

**Part 2A – Disclosures about Alta Summit Capital, LLC d/b/a AgentSmyth Advisors.**

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**Item 4. Advisory Business**

Alta Summit Capital, LLC d/b/a AgentSmyth Advisors, (the “Firm”) is a Delaware limited liability company founded in 2023. The principal owners of the Firm are Michael Block and DJQ Ventures LLC (“DJQ”). DJQ is wholly owned by Daniel McCooey.

AgentSmyth, LLC (“AgentSmyth”) wholly owns the intellectual property and licenses the relevant technology to the Firm. AgentSmyth is controlled by Daniel McCooey (25%), Michael Block (16.5%), and Pulkit Jaiswal (40.5%), the Chief Technology Officer of the Firm.

The Firm provides advice through its operational interactive website or its computer software-based models which provide investment advice to clients based on personal information each client supplies through the website or models.

The Firm’s business consists of the sale of digital research products on a subscription basis, which includes fundamental research on companies, research on sectors and industries, and investment strategies and other analytical pieces developed through the use of artificial intelligence, including stock predictions and/or recommendations via an operational interactive website. Such services are sold via a password protected website on a subscription basis to primarily institutional investors. The Firm offers its advisory services through artificial intelligence agents (“AI Agents”), on an on-going basis. Clients will generally have access to five different types of AI Agents that will analyze macro trends and trading data, distill market emotions, analyze fundamentals, detect market anomalies, and generate buy and sell trading signals.

The Firm does not provide a full range of discretionary advisory services, nor does it offer advice with respect to the suitability of trading strategies, or strategies relating to other tradable instruments (e.g., futures, options), or certain matters that are beyond the scope of its AI Agents.

At present, the Firm typically may be engaged to provide its research services on an episodic basis (e.g., a specific research project) or on a periodic basis with increased levels of AI Agent access and customer support depending on the client’s subscription tier. In such cases, the Firm has no authority (discretionary or non-discretionary) over any customer’s assets, nor does the Firm have access to any customer accounts with any institution or any other personally identifiable customer information.

The Firm has no assets under management. Clients may request more current information at any time by contacting our firm.

**Item 5. Fees and Compensation**

Fees charged by the Firm will be based on daily rates or fixed fees as to be negotiated with each client.

Fees, while agreed in advance, are generally billed by and due to the Firm after the delivery of the AI Agent. Thus, refunds of fees are not applicable because the fees are billed in arrears.

**Item 6. Performance-Based Fees**

The Firm will not charge performance-based fees.

**Item 7. Types of Clients**

The Firm provides its advisory services to a range of client types, including individuals as well as institutional clients. Data and tools are sold via web-based signups to clients that may be interested in the Firm's AI Agents.

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

The primary method of analysis used by the Firm in performing its advisory services is the use of artificial intelligence to analyze unstructured alternative data to help identify investment themes and opportunities. The Firm models equip traders, analysts, and portfolio managers with specialized digital AI Agents that deliver market insights based on inputs provided by clients.

The main sources of information include fundamental and technical analyses of the markets and various equities. Our models attempt to scrutinize vast market landscapes, economic patterns, and details of individual stocks.

The Firm uses outputs from its artificial intelligence models to assist clients with their trading in the markets.

**Investment Strategies**

The Firm does not employ any particular investment strategy with its clients, as it is not managing assets or directing investments for or on behalf of any other party. Because of the limited nature of its work, the Firm believes that its clients use the Firm's AI Agents as one part of their overall investment strategy, but the Firm itself does not have input or direction over any client's investment strategy or objectives or asset allocation goals. As a result, the Firm's services are used by its clients primarily so they are able to develop a better understanding of a particular security in their portfolios, or a better view on a particular sector. The Firm has no involvement with any subsequent decisions a client may make regarding the content of the AI Agents or services that the Firm provides.

## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Securities markets can experience significant declines due to a number of factors, including adverse political, regulatory, market or economic developments. In general, participants in securities markets may face the following risks:

*Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

*Inflation Risk:* When any type of inflation is present, a dollar today will not buy as much as 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.

*Foreign Exposure Risk:* Foreign securities and securities issued by US entities with substantial overseas operations can involve additional risks relating to political, economic, or regulatory conditions in foreign countries. These risks can include currency risks, trading and operational risks, and less stringent investor protection models.

*Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

*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. Recent developments in the markets have suggested that liquidity in many fixed income instruments may be declining as market participants reduce inventories of investments and reduce their market-making activities.

*Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms

of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

*Artificial Intelligence Risk Generally:* Independent of its context of use, artificial intelligence (“AI”) and machine learning technology is generally highly reliant on the collection and analysis of large amounts of data, and it is not possible or practicable to incorporate all relevant data into the models that AI and machine learning technology utilizes to operate. Certain data in such models will inevitably contain a degree of inaccuracy and error, potentially materially so, and could otherwise be inadequate or flawed, which would be likely to degrade the effectiveness of AI and machine learning technology. To the extent that a client is exposed to the risks of AI and machine learning technology use, any such inaccuracies or errors could have adverse impacts on the client. AI and machine learning technology and its applications, including in the private investment and financial sectors, continue to develop rapidly, and it is impossible to predict the future risks that may arise from such developments.

*Early-Stage Development of Artificial Intelligence:* As with many innovations, AI presents risks and challenges that could adversely impact the business of a client. The development, adoption, and use for AI technologies are still in their early stages and ineffective or inadequate AI development or deployment practices by the Firm could result in unintended consequences. The legal and regulatory landscape surrounding AI technologies is rapidly evolving and uncertain, including in the areas of intellectual property, cybersecurity, and privacy and data protection. For example, there is uncertainty around the validity and enforceability of intellectual property rights related to the use, development, and deployment of AI. Compliance with new or changing laws, regulations or industry standards relating to AI may impose significant operational costs and may limit the ability of the Firm to develop, deploy or use AI technologies. Failure to appropriately respond to this evolving landscape may result in legal liability, regulatory action, or brand and reputational harm and have a material adverse effect on clients.

**Item 9. Disciplinary Information**

Neither the Firm, its management persons, nor its employees have been involved in legal or disciplinary events that are material to a client or potential client’s evaluation of the Firm’s advisory business.

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

The Firm is not engaged in any other financial industry activities other than the activities described above and does not sell any other products or services other than as described above.

**Affiliations**

Daniel McCooey co-founded Third Seven Capital LLC (“Third Seven Capital”), a FINRA-registered broker-dealer which Mr. McCooey has been registered with since 2015. Mr. McCooey holds FINRA broker dealer licenses including the Series 7, 55, 63, 24, 57TO, 14, 3 and the SIE. Michael Block has been registered with Third Seven Capital since 2018 and holds FINRA broker dealer licenses including Series 24, 57TO, 79TO, 55, 87, 86, 7, 3, 63, and the SIE.

Third Seven Capital will not be executing any transactions on behalf of advisory clients of the Firm.

The Firm was previously the manager of Alta Summit Partners, LP (“Alta Summit Partners”), a private fund. Alta Summit Partners and its general partner, Alta Summit GP, LLC, are in the process of being dissolved.

Daniel McCooey and Michael Block are the principals of Midas High Touch LLC (“Midas High Touch”), a limited liability company formed to participate in co-investment opportunities, however, Midas High Touch currently does not have any investments.

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

The employees of the Firm have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The Firm will provide a copy of the Code of Ethics to any client or prospective client upon request. Employees of the Firm are required to abide by the Code of Ethics.

**Participation or Interest in Client Transactions**

Not applicable.

**Personal Trading**

All employees of the Firm must report their securities trading activities to Michael Block (the “Chief Compliance Officer”) no less often than quarterly, and every employee has given, and annually recertifies, to the Chief Compliance Officer, the Firm’s right to request brokerage account and trading records to ensure that all personal trading is in compliance with its policies and procedures.

Employees of the Firm are strictly prohibited from trading in the securities of companies for which they have research coverage responsibilities unless such trade has been approved in advance in writing by the Chief Compliance Officer. In addition, all employees are prohibited from trading in the securities of any issuer as



to which they are aware of any unpublished research reports. From time to time, employees of the Firm may buy a security that is also recommended by the Firm's software models.

These rules are designed to ensure that employees do not trade in advance of the publication of research that might be market-moving, and to ensure that employees do not put their interest in a personal investment position ahead of their research responsibilities, both of which could constitute conflicts of interest with the interests of clients.

Employees of the Firm are also required to certify with respect to each trade of securities that they make that they have not made the trade on the basis of material non-public information.

**Item 12. Brokerage Practices**

**Research and Other Soft Dollar Benefits**

Not applicable

**Brokerage for Client Referrals**

Not applicable

**Directed Brokerage**

Not applicable

**Order Aggregation**

Not applicable

**Item 13. Review of Accounts**

Any applicable reviews or reports produced with respect to a client will be negotiated and agreed upon in the client's agreement with the Firm.

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

**Incoming Referrals, Referrals Out, Other Compensation**

Not applicable.

**Item 15. Custody**

Due to the nature of the Firm's business, it does not request or accept authority over client assets. Thus, the Firm is not deemed to have custody of client assets.

Not applicable, as the Firm does not manage any client accounts, nor does the Firm have any custodial assets, arrangements with custodians, or any access to any client account or account information.

**Item 16. Investment Discretion**

The Firm does not request, nor will it accept, any authority whatsoever to manage securities or security accounts on behalf of its clients.

**Item 17. Voting Client Securities**

As the Firm does not have authority over any client securities accounts, the Firm will not vote proxies on securities on behalf of its clients. Clients are expected to vote their own proxies. The Firm has not been requested to provide proxy recommendations to any client, but if the Firm were requested to provide proxy recommendations as part of an advisory agreement, the Firm would do so, and would disclose any potential conflicts of interest, if such potential conflict did in fact exist.

**Item 18. Financial Information**

**Financial Condition**

The Firm does not have any financial impairment that would preclude it from meeting contractual commitments to clients. The Firm does not solicit or charge clients more than \$1,200 in fees six months or more in advance.

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

Not applicable.

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