



## Investment Advisory Services

Firm Disclosure Brochure, Form ADV  
Part 2A

Item 1 Cover Page

### DISCLAIMER:

This brochure provides information about the qualifications and business practices of StreetWise Capital, LLC. If you have any questions about the contents of this brochure, please contact us at (678) 315-1194. 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 StreetWise Capital, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our firm's CRD number is 301817

### NOTE:

While StreetWise Capital, LLC may refer to itself as a "registered investment advisor" or "RIA", Clients should be aware that registration itself does not imply any level or skill or training.

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## Item 2: Material Changes

### *Annual Update*

This is the annual update of brochure for StreetWise Capital, LLC for 2022. This brochure will be updated annually or whenever any material changes occur to the company or its business practices since the last release of the firm brochure.

### *Material changes since last update*

1. Assets Under Management is updated to reflect current AUM
2. Update to Sarath Nallamudi's business experience

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## Item 4: Advisory Business

StreetWise Capital, LLC (the “Registrant” or “StreetWise”) is a limited liability company formed on February 2019 in the state of Georgia. The registrant is 100% owned by Sarath Nallamudi.

StreetWise offers to its clients (firms and high net worth individuals) investment advisory services, and, to the extent specifically requested by a client, financial planning and related consulting services. StreetWise is a fee based financial planning and investment advisory firm. The firm does not sell any securities or insurance, or other commission-based products.

StreetWise offers discretionary and non-discretionary direct Asset and Portfolio management services to advisory clients. StreetWise will offer clients ongoing portfolio management services as per individual investment goals, time horizons, objectives, and risk appetite. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on client specific factors.

**Discretionary:** When the client provides StreetWise discretionary authority, the client signs a limited trading authorization. StreetWise will have the authority to execute transactions in the account without seeking client approval on each transaction.

**Non-discretionary:** When the client elects to use StreetWise on a non-discretionary basis, StreetWise will determine the portfolio allocation, financial instruments to use to achieve the target portfolio allocation, quantity and price. However, StreetWise will obtain prior client approval on each and every transaction before executing any transactions.

### *Types of Investment Advisory Services*

The client can determine to engage the Registrant to provide discretionary and/or nondiscretionary investment advisory services on a fee-only basis. The Registrant’s investment advisory fee is based upon a percentage (%) of the market value of the assets placed under the Registrant’s management and performance fees where applicable.

Registrant’s investment advisory fee shall include investment advisory services, and, to the extent specifically requested by the client, financial planning and consulting services. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Registrant), the Registrant may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

Prior to providing investment advisory services, an investment adviser representative will ascertain each client’s investment objective(s) and risk profile. Thereafter, the Registrant shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s) and risk profile. The Registrant primarily allocates (or

recommends that a client allocate) client investment assets among various financial instruments and, to a much lesser extent, independent managers, on a discretionary and nondiscretionary basis in accordance with the client's designated investment objective(s) and risk profile. Periodic reviews are also performed to provide reminders of the specific courses of action. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Based on client profile, StreetWise classifies its' clients into standard client and qualified client and provide advisory services accordingly. StreetWise relies on the State and Federal laws to determine qualified clients. Any client with a minimum net worth of \$2.1 million or at least \$1 million in Assets Under Management with StreetWise qualifies as qualified person/client. Any client that does not meet the requirements of qualified person will be classified as standard client.

While StreetWise focuses on strategic and tactical portfolio management strategies for standard clients, it relies on client specific advanced/sophisticated strategies for qualified clients. StreetWise aims to achieve absolute returns for qualified clients under all market conditions. Because of the complexity and risk involved in the sophisticated strategies, not all clients are eligible to be qualified clients.

#### *Client Tailored Services and Restrictions*

To the extent requested by a client, the Registrant may determine to provide financial planning and/or consulting services (investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. Prior to engaging the Registrant to provide planning or consulting services, clients are generally required to enter into a Financial Planning and Consulting Agreement with Registrant setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Registrant commencing services.

If requested by the client, Registrant may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

#### *Non-Investment Services*

StreetWise may provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc., may publish newsletters and conduct educational seminars. Neither the Registrant, nor any of its representatives, serves as an

attorney, accountant, or licensed insurance agent, and no portion of the Registrant's services should be construed as same.

#### *Trade Error Policy*

Registrant shall reimburse accounts for losses resulting from the Registrant's trade errors, but shall not credit accounts for such errors resulting in market gains. The gains and losses are reconciled within the Registrant's custodian firm account and Registrant retains the net gains and losses.

#### *Client Obligations*

In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

#### *Disclosure Statement*

A copy of the Registrant's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the Investment Advisory Agreement or Financial Planning and Consulting Agreement.

#### *Wrap Fee Programs*

Streetwise does not sponsor/participate in any wrap fee programs

#### *Client Assets Under Management*

Streetwise currently has approximately \$800,000 Assets Under Management on discretionary basis and no Assets Under Management on non-discretionary basis.

## Item 5: Fees and Compensation

StreetWise assesses its' fees based on the type of client. Fees to standard clients will be based on the Assets Under Management (AUM) and is called Management fee. Qualified clients will be assessed a Management fee that is based on the AUM and performance fee based on the capital gains in the qualified client account. Performance fees for qualified clients are assessed because of the need for active monitoring and implementation of sophisticated strategies in qualified client's accounts.

#### *Method of Compensation and Fee Structure*

**Management Fee:** Management fee will be based on the Assets Under Management at the beginning of the monthly billing period. Management fee will be a percentage (%) of the market value of Assets Under Management. Management fee will be assessed on the client accounts

prorated to the monthly billing period as per the following table. Both standard clients and qualified clients are assessed with the management fee.

Market Value of Portfolio	% of Assets
Up to \$2,000,000	1.80%
\$2,000,000 to \$5,000,000	1.5%
\$5,000,000 to \$7,500,000	1.25%
\$7,500,000 to \$10,000,000	1.00%
\$10,000,000 and above	Negotiable

**Performance Fee:** Performance fee will be based on the capital gains achieved in the client account during the quarterly billing period. Based on the timing of the invoice, it is to be noted that the capital gains could be both realized and unrealized in the client account. This ensures that the trading activity in the client account do not conflict with the billing cycle keeping the client interests paramount. A performance fee of 20% on the realized/unrealized capital gains will be assessed for the quarterly billing period. Only qualified clients will be assessed this performance fee. Qualified client is defined as follows:

- i. Any client with at least \$1,000,000 assets under management with StreetWise
- ii. Any client with a net worth of at least \$2,100,000 excluding equity in their primary home

The capital gains in the client account are calculated using the following formula.

Capital gains = Realized capital gains + Unrealized capital gains – Realized capital losses – Unrealized capital depreciation

While computing capital gains, StreetWise practices the high-water mark concept. If AUM in any client account at the end of a quarterly billing cycle falls below the AUM in previous billing cycle, StreetWise will not assess any performance-based fees. The high AUM from previous quarterly billing cycle will be treated as high water mark AUM that must be exceeded for performance fees to be triggered. Subsequent capital gains will be calculated from the high-water mark AUM. StreetWise aims to exceed the high-water mark AUM in two quarters. However, extraordinary circumstances may not enable StreetWise to do so. In such circumstances and to avoid taking undue risks, StreetWise revises the high-water mark AUM to that of the AUM at the end of the second quarter.

Because performance fees are calculated based on the capital gains in the client account, this may incentivize StreetWise to take more risks than necessary in a qualified client account.

**Financial Planning Fees:** Financial plans are based on an hourly fee at a rate of \$150 per hour, priced according to the degree of complexity associated with the client's situation. Prior to the

planning process the client is provided an estimated plan fee. The payment is due upon delivery of the plan. Financial Planning fees are negotiable and StreetWise reserves the right to waive the financial planning fee if plan is implemented with StreetWise. Clients may cancel within five (5) days of signing the agreement with no obligation. If the client cancels after five (5) days, any earned, unpaid prorated fees will be due to StreetWise based on the percentage of work completed.

**News Letter fees:** Streetwise charges a fixed \$50/month for its news letter subscribers.

All fees including Management fee, Performance Fee and Financial planning fee are negotiable. StreetWise reserves the right to negotiate fees with individual clients based on the circumstances that may or may not base on AUM. The fees listed in this document serve as general guidelines and as the maximum amounts/percentages of fees assessed. Any change in the fee structure and/or schedule will be communicated to all clients and state administrators by way of updating this document and distributing it to all clients.

#### *Client Payment of Fees*

Clients may elect to have the Registrant's advisory fees deducted from their custodial account. Both Registrant's Investment Advisory Agreement and the custodial/ clearing agreement may authorize the custodian to debit the account for the amount of the Registrant's investment advisory fee and to directly remit that management fee to the Registrant in compliance with regulatory procedures. In the limited event that the StreetWise bills the client directly, payment is due upon receipt of the Registrant's invoice. The Registrant shall deduct fees and/or bill clients monthly/quarterly, based upon the market value of the assets on the last business day of the previous month/quarter.

Financial planning services fees are due upon delivery of the plan.

The Investment Advisory Agreement between StreetWise and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Investment Advisory Agreement. Upon termination, StreetWise may charge the pro-rated portion of the advisory fees based upon the number of days in the billing cycle.

#### *Additional Client Fees Charged*

Custodians may charge transaction fees on purchases or sales of certain mutual funds, stocks, equities, exchange-traded funds and other securities. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees.

StreetWise, in its sole discretion, may waive its fee and/or charge a lesser investment advisory fee 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.)



*Prepayment of Client Fees*

StreetWise does not require any prepayment of fees

*External Compensation for the Sale of Securities to Clients*

Neither StreetWise, nor its representatives accept compensation from the sale of securities and/or other investment products.

## Item 6: Performance based Fees and Side-by-Side Management

StreetWise charges performance fees based on realized/unrealized capital gains on qualified client accounts only. For more details on performance-based fees, please see “Performance fees” section in “Item 5: Fees and Compensation”.

## Item 7: Types of Clients

StreetWise’s clients shall generally include individuals, business entities, trusts, estates, university endowments and charitable organizations.

Based on client profile, StreetWise classifies its’ clients into standard client and qualified client and provide advisory services accordingly. StreetWise relies on the State and Federal laws to determine qualified clients. Any client with a minimum net worth of \$2.1 million or at least \$1 million in Assets Under Management with StreetWise qualifies as qualified person/client. Any client that does not meet the requirements of qualified person will be classified as standard client.

*Account Minimums*

StreetWise requires a minimum of \$100,000 to open an account, but reserves the right to accept accounts with lesser assets at StreetWise’s discretion

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

*Methods of Analysis*

StreetWise may utilize the following methods of security analysis:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts). This could include company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

The main sources of information include StreetWise's financial analysis/projections, internal valuation models, financial newspapers and magazines, research materials prepared by others, corporate rating services, 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 and risk profile. Each client executes a client profile form or similar form that documents their objectives and their desired investment strategy based on their risk profile. StreetWise may utilize long-term purchases held for at least a year, short-term purchases that are held for less than a year and trading for even shorter durations.

### *Security Specific Material Risks*

Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by StreetWise) will be profitable or equal any specific performance level(s).

StreetWise's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis StreetWise must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, certain analyses may be compiled with outdated market information, severely limiting the value of the analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different investment strategies involve different risks such as interest rate risk, market risk, business risk, financial/credit risk, inflation risk, reinvestment risk, and currency risk. Investors should be mindful of these risks and be ready to assume these risks while investing in securities. Investors facing the following risks should discuss their options with StreetWise in order to hedge that risk.

- *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.
- *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 tomorrow will buy less 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.
- *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.
- *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.
- *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.

#### *Other risks*

In addition to the risks faced above, there could be additional risks that an investor should be aware of. These risks include but not limited to geo-political risks, risk of war, risk of cyclone or other weather-related risks, market breakdowns/failures, issues with exchanges etc. These risks are beyond the control of StreetWise and in most circumstances, can not be hedged away. StreetWise will not be held liable for such risks.

## Item 9: Disciplinary Information

### *Criminal or Civil Actions*

StreetWise and its management have not been involved in any criminal or civil action

### *Administrative Enforcement Proceedings*

StreetWise and its management have not been involved in any administrative enforcement proceedings

### *Self-Regulatory Organization Enforcement Proceedings*

StreetWise and its management have not been involved in any legal or disciplinary events related to past or present investment clients.

## Item 10: Other Financial Industry Activities and Affiliations

### *Broker-Dealer or Representative Registration*

Neither StreetWise, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer

### *Futures or Commodity Registration*

Neither StreetWise, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing

### *Material Relationships Maintained by this Advisory Business and Conflicts of Interest*

StreetWise does not have any relationship or arrangement that is material to its advisory business or to its clients with any related person

### *Recommendations or Selections of Other Investment Advisors and Conflicts of Interest*

StreetWise does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients

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

### *Code of Ethics Description*

StreetWise maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant's representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant

StreetWise and its employees have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct and serves as a guideline to address conflicts that may arise. The Code defines acceptable behavior for StreetWise employees. The Code reflects StreetWise and its supervised persons' responsibility to act in the best interest of their client.

StreetWise's Code is based on the guiding principle that the interests of the client are paramount. StreetWise's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients.

#### *Investment recommendations Involving a Material Financial Interest and Conflict of Interest*

Neither StreetWise, nor any related person of StreetWise recommends, buys, or sells for client accounts, securities in which StreetWise or any related person of Registrant has a material financial interest

#### *Advisory Firm purchase of same securities recommended to clients and conflict of interest*

The Registrant and/or representatives of the Registrant may buy or sell securities that are also recommended to clients. This practice may create a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Registrant's clients) and other potentially abusive practices.

In order to mitigate these risks, chief compliance officer reviews all firm and employee transactions periodically but at least once a quarter. Employees are required to provide quarterly brokerage statements of their personal accounts.

#### *Client securities recommendations or trades and concurrent advisory firm securities*

The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons". The Registrant's securities transaction policy requires that an Access Person is required to disclose all reportable securities transactions as well as provide StreetWise with copies of their brokerage statements.

Chief Compliance Officer, Sarath Nallamudi, reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees do not affect the markets and that clients of the firm receive preferential treatment over employee transactions

#### *Transactions and conflicts of interest*

The Registrant and/or representatives of the Registrant may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons

## Item 12: Brokerage Practices

#### *Factors used to select broker-dealers for client transactions*

StreetWise may recommend the use of a particular broker-dealer such as Interactive Brokers or may utilize a broker-dealer of the client's choosing. StreetWise will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. StreetWise 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 StreetWise.

**Directed Brokerage:** In circumstances where a client directs StreetWise to use a certain broker-dealer, StreetWise still has a fiduciary duty to its clients. It is to be noted that the directed brokerage may limit StreetWise's ability to negotiate commissions, to obtain volume discounts etc. There may be a disparity in commission charges among clients, and conflicts of interest arising from brokerage firm referrals.

**Best Execution:** Investment advisors who manage or supervise client portfolios have a fiduciary obligation of best execution. 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 executed, 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. The firm does not receive any portion of the trading fees.

**Soft Dollar Arrangements:** StreetWise does not have any soft dollar arrangements with any broker-dealers

#### *Aggregating securities transactions for client accounts*

StreetWise is authorized in its discretion to aggregate purchases, sales and other transactions made for the account with purchases, sales and transactions in the same securities for other Clients of StreetWise. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis

## Item 13: Review of Accounts

### *Schedule for periodic review*

For those clients to whom StreetWise provides investment supervisory services, account reviews are conducted on an ongoing basis by the Registrant's Principals and/or representatives, at a minimum once a quarter. All investment supervisory clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Registrant on an annual basis

### *Non-periodic reviews*

StreetWise may conduct account reviews on other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request

### *Client Reports and Frequency*

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/ custodian and/or program sponsor for the client accounts. StreetWise may also provide a written periodic report summarizing account activity and performance

## Item 14: Client Referrals and Other Compensation

### *Economic benefits from External Sources and Conflicts of Interest*

StreetWise may receive an indirect economic benefit from Interactive Brokers (IB). The Registrant, without cost (and/or at a discount), may receive support services and/or products from IB. Registrant's clients do not pay more for investment transactions effected and/or assets maintained at IB as a result of this arrangement. There is no corresponding commitment made by the Registrant to IB or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement. The Registrant's Chief Compliance Officer, Sarath Nallamudi, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.

### *Payments for Client Referrals*

If a client is introduced to the Registrant by either an unaffiliated or an affiliated solicitor, Registrant may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from the Registrant's investment advisory fee, and shall not result in any additional charge to the client. If the client is introduced to the Registrant by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of the Registrant's written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between the



Registrant and the solicitor, including the compensation to be received by the solicitor from the Registrant

## Item 15: Custody of Client Funds

### *Account Statements*

All client 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 review their account statements received directly from their custodians.

StreetWise is deemed to have constructive custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of StreetWise. 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 in this paragraph (b)(3). Such notification is required to be given on Form ADV

## Item 16: Investment Discretion

### *Discretionary Authority for Trading*

The client can determine to engage StreetWise to provide investment advisory services on a discretionary basis. Prior to the Registrant assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming the Registrant as the client's attorney and agent in fact, granting the Registrant full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the Registrant on a discretionary basis may, at any time, impose restrictions, in writing, on the Registrant's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Registrant's use of margin, etc.).



StreetWise will consult with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given

## Item 17: Voting in Client Securities

### *Proxy Votes*

StreetWise does not vote client proxies. Clients maintain exclusive responsibility for:

(1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact StreetWise to discuss any questions they may have with a particular solicitation for recommendations. Any conflict of interests will be disclosed prior to making those recommendations.

## Item 18: Financial Information

### *Balance Sheet*

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

### *Financial impairments*

StreetWise is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts

### *Bankruptcy Petitions*

Neither StreetWise nor its management team has 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 Sarath Nallamudi can be found in the Part 2B of this brochure

### *Outside Business Activities*

The outside business activities for Sarath Nallamudi can be found in Part 2B of this brochure

### *Performance Based Fee Description*

StreetWise charges performance fees based on realized/unrealized capital gains on qualified client accounts only. For more details on performance-based fees, please see "Performance fees" section in "Item 5: Fees and Compensation"

- Qualified client is a client with at least \$1 million assets under management with StreetWise or have a minimum net worth of \$2.1 million
- Based on the billing cycle, performance fees may be assessed on both realized gains and/or unrealized gains. The unrealized gains might not be realized subsequently.
- Performance fees may incentivize StreetWise to take more risk than needed in a client account.

### *Arbitration or Disciplinary Actions*

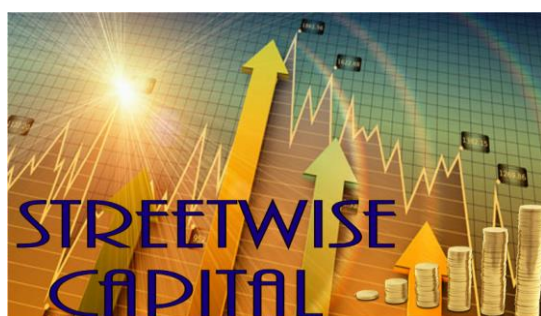
Either StreetWise or its management team has never been involved in an arbitration proceeding or a civil, self-regulatory, or administrative proceeding.

### *Material Relationships with Issuers of Securities*

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

### *Material Conflicts of Interest Assurance*

All material conflicts of interest regarding StreetWise, 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). There is nothing to report at this time.



## Investment Advisory Services

Brochure Supplement – Form ADV, Part 2B

Supervised Person Brochure

Sarath Nallamudi

## Item 1 Cover Page

### DISCLAIMER:

This brochure supplement provides information about Sarath Nallamudi and supplements the StreetWise Capital LLC's brochure. You should have received a copy of that brochure. Please contact Sarath Nallamudi if you did not receive the brochure or if you have any questions about the contents of this supplement. Additional information about Sarath Nallamudi (CRD # 7093150) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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[www.streetwisecapital.net](http://www.streetwisecapital.net)

## Sarath Nallamudi

Sarath Nallamudi was born in 1976. Mr. Nallamudi has Master of Business Administration degree from Emory University, Goizueta Business School. His complete educational background is given below.

## Item 2: Educational Background and Business Experience

### *Educational Background*

1. EMORY UNIVERSITY, GOIZUETA BUSINESS SCHOOL	Atlanta, GA
<i>M.B.A., Strategy &amp; Finance Concentration</i>	<i>May 2018</i>
2. TEXAS TECH UNIVERSITY	Lubbock, TX
<i>M. S., Electrical Engineering</i>	<i>Dec. 2002</i>
3. JNTU COLLEGE OF ENGINEERING	Anantapur, India
<i>B. Tech., Electrical &amp; Electronics Engineering</i>	<i>Dec. 1999</i>

### *Business Experience*

1 <sup>st</sup> Franklin Financial Corporation	Toccoa, GA
Data Science Manager	2021 - Present
FLEETCOR Technologies	Atlanta, GA
Sr. Risk Analyst	2019 - 2021
GENERAL MOTORS	Atlanta, GA
<i>Senior PeopleSoft Lead</i>	<i>2014 - 2019</i>
SRS SYSTEMS, LLC	Cumming, GA
<i>Director / Principal Consultant</i>	<i>2011 - 2014</i>
APPLE SOFT, INC	Dallas, TX

Sr. Lead Consultant  
Global IT, INC  
PeopleSoft Analyst

2005 - 2010  
Irving, TX  
2004 - 2005

### Item 3: Disciplinary Information

*Criminal or Civil Action:* None to report.

*Administrative Proceeding:* None to report.

*Self-Regulatory Proceeding:* None to report.

### Item 4: Other Business Activities

In addition to the investment advisory, Mr. Nallamudi also provides consulting services including but not limited to business consulting, growth strategies, go-to market strategies, financial and valuation services, information technology consulting services. Mr. Nallamudi also identifies businesses to acquire and may present such opportunities to investors. Mr. Nallamudi works as Data Science Manager with 1<sup>st</sup> Franklin Financial Corporation. While Mr. Nallamudi do not anticipate any conflict of interests arising out of these business activities, any conflict of interests that may arise because of these activities will be promptly notified to concerned clients.

### Item 5: Additional Compensation

Sarath Nallamudi does not receive any additional compensation for performing investment advisory services other than mentioned in part 2A of the firm brochure.

### Item 6: Supervision

Sarath Nallamudi is the sole owner of StreetWise Capital, LLC and therefore he 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.

### Item 7: Requirements for State Registered Advisors

Mr. Nallamudi has never been involved in an arbitration proceeding or a civil, self-regulatory, or administrative proceeding.

Mr. Nallamudi has never been the subject of a bankruptcy petition.