Nidhi Capital, LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Nidhi Capital, LLC. If you have any questions about the contents of this brochure, please contact us at (636) 533-4886 or by email at: ravi@nidhicapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Nidhi Capital, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Nidhi Capital, LLC's CRD number is: 157319

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Registration does not imply a certain level of skill or training.

Version Date: 03/14/2025

Item 2: Material Changes

No Material Changes

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of the Advisory Firm

Nidhi Capital, LLC is a Limited Liability Company organized in the state of Missouri. This firm was approved in Missouri on August 8, 2011, and the principal owner is Ravi Kumar V Devisetty.

B. Types of Advisory Services

Nidhi Capital, LLC (hereinafter "NC") offers the following services to advisory clients:

Investment Supervisory Services

NC offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. NC creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

NC evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. NC will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Performance Based Fees

Qualified investors may be charged performance fees based on net profits above a mutually agreed upon high water mark. Qualified investors may choose to not utilize the performance based fee service, and simply utilize the investment supervisory service with NC. High water mark is defined as the highest peak in value that an investment fund/account has reached. This term is often used in the context of fund manager compensation, which is performance based.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees and hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

Retirement Plan Services

NC will also offer the following retirement planning services:

1) provide advice to the plan sponsor regarding the investments to be held by the plan (for defined benefit plans) or to be offered as investment options under the plan (for participant directed plans); or
2) act as the plan's investment manager in making these decisions on a discretionary basis. NC will acknowledge it is acting in a fiduciary capacity when providing investment advice or management to an ERISA-qualified plan for a fee.

NC will offer direct investment advice to participants of the retirement plan regarding specific investments that should be held in their account. NC may also actively manage their plan accounts. NC will also offer non-fiduciary services to an ERISA-qualified plan. These services may include but are not limited to; participant education and enrollment, assistance with vendor searches and benchmarking and providing general advice to the plan sponsor.

Services Limited to Specific Types of Investments

NC generally limits its investment advice and money management to mutual funds, equities, bonds, fixed income, debt securities, distressed securities, warrants, leaps, ETFs, REITs, and government securities. NC may use options to hedge the portfolio as it depends on market conditions. NC may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

NC offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. NC does not participate in any wrap fee programs.

E. Amounts Under Management

NC has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$9,134,976	$0	3/14/2025

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
First $500,000	1.25%
Up to $1,000,000	1.25%
Above $1,000,000	1.00%

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with thirty days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization. In case automatic withdrawal is not available, Advisory fees may also be invoiced and billed directly to the client quarterly in arrears.

In cases where Advisor fees are directly deducted, Advisor is required to a.) Obtain client authorization, b.) Disclose that the custodian will send quarterly invoices/statement to the client wherein Advisor fees are itemized. Lower fees for comparable services may be available from other sources.

Performance Based Fees

Qualified investors who utilize the performance fee service will endure the performance based fee of 25% of net profits above the high water mark with a hurdle rate of 6.00%. If the asset value goes down in the first year, then the hurdle rate will be compounded 6%. For example, if the client gives $100 and if the asset value goes down to $98 in year 1. At the end of second year, we will only charge fees if the value of the investment goes above 112.36 (100*1.06*1.06). If the performance fee service is selected, qualified investors will not be charged an additional asset based management fee on all assets under management. Fees are paid annually(based on date of joining) and incase the client terminates at any other time before yearend annually, Fees will be calculated based on monthly/quarterly in arrears, and clients may terminate their contracts with thirty days' written notice. Performance fees will only be charged in accordance with the provisions of California Code of Regulations Section 260.234. High water mark is defined as the highest peak in value that an investment fund/account has reached. This term is often used in the context of fund manager compensation, which is performance based.

Financial Planning Fees

Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between $200 and $2,000. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

Hourly Fees

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is between $100 and $500. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

Retirement Planning Fees

Fees for this service will be charged as a percentage of the assets in the plan. The following factors are considered when determining the fee charged: the level of assets in the plan, the number of participants, the number and complexity of the investment options utilized within the plan, and the services to be provided. All compensation to be received by NC as a result of any fiduciary services it provides to an ERISA-qualified plan will be fully disclosed to the plan sponsor in compliance with Regulation 408(b)(2)

Performance fees are charged to Qualified Clients* only. "Qualified Client" pursuant to Texas Securities Board rule 116.13(b):

Any registered investment adviser who wishes to charge a fee based on a share of the capital gains or the capital appreciation of the funds or any portion of the funds of a client must comply with SEC Rule 205-3 (17 Code of Federal Regulations §275.205-3), which prohibits the use of such fee unless the client is a "qualified client." In general, a qualified client may include:

(1) a natural person or company who at the time of entering into such agreement has at least $1,000,000 under the management of the investment adviser; (2) a natural person or company who the adviser reasonably believes at the time of entering into the contract: (A) has a net worth of jointly with his or her spouse of more than $2,000,000; or (B) is a qualified purchaser as defined in the Investment Company Act of 1940, §2(a)(51)(A) (15 U.S.C. 80a-2(51)(A)); or (3) a natural person who at the time of entering into the contract is: (A) An executive officer, director, trustee, general partner, or person serving in similar capacity of the investment adviser; or (B) An employee of the investment adviser (other than an employee performing solely clerical, secretarial, or administrative functions with regard to the investment adviser), who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar function or duties for or on behalf of another company for at least 12 months.

All services are negotiable based on complexity and size. The fees are dependent based on the service selected in Exhibit III

Total Assets Under Management	Annual Fee
First $500,000	1.25%
Up to $1,000,000	0.75%
Above $1,000,000	0.5%

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client’s accounts with client written authorization. Fees are paid quarterly in arrears. In case automatic withdrawal is not available, Advisory fees may also be invoiced and billed directly to the client quarterly in arrears.

Payment of Performance Based Fees

Performance Based fees are withdrawn directly from the client’s accounts with client written authorization. Fees are paid annually unless the client terminates in the middle of the year then a monthly/quarterly will be charged in arrears.

Payment of Financial Planning Fees

Hourly Financial Planning fees are paid via check or credit card in arrears upon completion. Because fees are charged in arrears, no refund is necessary. Fixed Financial Planning fees are paid via check or credit card in arrears upon completion. Because fees are charged in arrears, no refund is necessary.

Payment of Retirement Planning Fees

Fees for this service may be withdrawn directly from the account with client written authorization. Fees may also be invoiced and billed directly to the client.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by NC. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

NC collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither NC nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

F. Termination of Agreement

This agreement may be modified upon such terms as may be mutually agreed upon in writing. This agreement is terminable by you or us at any time, and for any reason with a 30-day written notice.

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

NC manages accounts that are billed on performance based fees (a share of capital gains on or capital appreciation of the assets of a client) as well as accounts that are NOT billed on performance based fees. Managing both kinds of accounts at the same time presents a conflict of interest because NC or its supervised person's have an incentive to favor accounts for which NC and its supervised persons receive a performance-based fee. NC addresses the conflicts by ensuring that clients who have performance based accounts do not receive preferential treatment. NC provides best execution practices and upholds its fiduciary duty for all clients.

Qualified investors who utilize the performance fee service will endure the performance based fee of 25% of net profits above the high water mark with a hurdle rate of 6.00%. If the asset value goes down in the first year, then the hurdle rate will be compounded 6%. For example, if the client gives $100 and if the asset value goes down to $98 in year 1. At the end of second year, we will only charge fees if the value of the investment goes above 112.36 (100*1.06*1.06). If the performance fee service is selected, qualified investors will not be charged an additional asset based management fee on all assets under management. Fees are paid annually(based on date of joining) and incase the client terminates at any other time before yearend annually, Fees will be calculated based on monthly/quarterly in arrears, and clients may terminate their contracts with thirty days' written notice. Performance fees will only be charged in accordance with the provisions of California Code of Regulations Section 260.234. High water mark is defined as the highest peak in value that an investment fund/account has reached. This term is often used in the context of fund manager compensation, which is performance based.

Clients that are paying a performance based fee should be aware that investment advisors have an incentive to invest in riskier investments when paid a performance based fee due to the higher risk/higher reward attributes.

Performance fees are charged to Qualified Clients* only. "Qualified Client" pursuant to Texas Securities Board rule 116.13(b):

Any registered investment adviser who wishes to charge a fee based on a share of the capital gains or the capital appreciation of the funds or any portion of the funds of a client must comply with SEC Rule 205-3 (17 Code of Federal Regulations §275.205-3), which prohibits the use of such fee unless the client is a "qualified client." In general, a qualified client may include:

(1) a natural person or company who at the time of entering into such agreement has at least $1,000,000 under the management of the investment adviser; (2) a natural person or company who the adviser reasonably believes at the time of entering into the contract: (A) has a net worth of jointly with his or her spouse of more than $2,000,000; or (B) is a qualified purchaser as defined in the Investment Company Act of 1940, §2(a)(51)(A) (15 U.S.C. 80a-2(51)(A)); or (3) a natural person who at the time of entering into the contract is: (A) An executive officer, director, trustee, general partner, or person serving in similar capacity of the investment adviser; or (B) An employee of the investment adviser (other than an employee performing solely clerical, secretarial, or administrative functions with regard to the investment adviser), who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar function or duties for or on behalf of another company for at least 12 months.

Item 7: Types of Clients

NC generally provides investment advice and management supervisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Small Businesses
- Institutional Clients

Minimum Account Size

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

NC's methods of analysis include fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Investment Strategies

NC uses long term trading, short term trading, short sales, margin transactions, and options writing (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

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.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

NC generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize short sales, margin transactions, and options writing. Short sales, margin transactions, and options writing generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies.

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.
Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Distressed securities are generally more volatile and less liquid investments.

Leap/Warrants: all things being equal, the value of a leap/ warrant will decay over time as it approaches its expiry date. Prices of leap/warrants can increase or decrease in line with the implied volatility of underlying asset price. Investors should be aware of the underlying asset volatility.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Concentration Risk: diversifying a client's portfolio will reduce the risk involved with investing. But concentrating client investments, this risk will not be reduced, and can therefore lead to significant losses if the concentrated investment performs poorly.

REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Precious Metal ETFs (Gold, Silver, Palladium Bullion backed "electronic shares" not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation.

Short sales risks include the upward trend of the market and the infinite possibility of loss.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral.

Options writing involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither NC nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither NC nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Ravi Devisetty is the President of Nidhi Realty LLC & Clarkchester One Realty LLC & Nidhi Gardens, LLC real estate investment companies, and the President of Nidhitech Systems LLC. Ravi Devisetty spends approximately 15% of his time in that capacity and does not consider it to be his primary business.

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

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

NC does not utilize nor select other advisers or third party managers. All assets are managed by NC management.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

NC does not recommend that clients buy or sell any security in which a related person to NC or NC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of NC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of NC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. NC will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of NC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of NC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. NC will always transact client's transactions before its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodians, Interactive Brokers LLC (CRD# 36418), Charles Schwab & Co (CRD# 5393) and Fidelity Brokerage Services LLC, (CRD# 7784) were chosen based on their relatively low transaction fees and access to mutual funds and ETFs. NC will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

1. Research and Other Soft-Dollar Benefits

NC receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that NC must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for NC to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for services or products it has an incentive to choose a custodian that provides those services based on its interests rather than the clients' interests. The first consideration when recommending broker/dealers to clients is best execution. NC always acts in the best interest of the client.

The research and other soft dollar benefits NC received will not cause clients to pay commissions higher than those charged by broker-dealers in return for soft dollar benefits. The research and other soft dollar benefits NC received are used to service all clients. Adviser seeks to allocate soft dollar benefits to client accounts proportionately to the soft dollar credits the accounts generate.

2. Brokerage for Client Referrals

NC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

NC allows clients to direct brokerage. NC may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage NC may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

NC maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing NC the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly only by Ravi Kumar V Devisetty, Managing Member. Ravi Kumar V Devisetty is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at NC are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Ravi Kumar V Devisetty, Managing Member. There is only one level of review and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least monthly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

NC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to NC clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

NC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

NC, with client written authority, has limited custody of client's assets through direct fee deduction of NC's Fees only. If the client chooses to be billed directly by Interactive Brokers LLC (CRD# 36418), Fidelity Brokerage Services LLC, (CRD# 7784) and Charles Schwab & Co (CRD# 5393). NC would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

For those client accounts where NC provides ongoing supervision, the client has given NC written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides NC discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

NC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

NC does not require nor solicit prepayment of more than $500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither NC nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

NC has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

NC currently has only one management person/executive officer; Ravi Kumar V Devisetty. Ravi Kumar V Devisetty's education and business background can be found on the Supplemental ADV Part 2B form.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Ravi Kumar V Devisetty's other business activities can be found on the Supplemental ADV Part 2B form.

C. How Performance Based Fees are Calculated and Degree of Risk to Clients

NC accepts performance based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client

Qualified investors who utilize the performance fee service will endure the performance based fee of 25% of net profits above the high water mark with a hurdle rate of 6.00%. If the asset value goes down in the first year, then the hurdle rate will be compounded 6%. For example, if the client gives $100 and if the asset value goes down to $98 in year 1. At the end of second year, we will only charge fees if the value of the investment goes above 112.36 (100*1.06*1.06). If the performance fee service is selected, qualified investors will not be charged an additional asset based management fee on all assets under management. Fees are paid annually(based on date of joining) and incase the client terminates at any other time before yearend annually, Fees will be calculated based on monthly/quarterly in arrears, and clients may terminate their contracts with thirty days' written notice. Performance fees will only be charged in accordance with the provisions of California Code of Regulations Section 260.234. High water mark is defined as the highest peak in value that an investment fund/account has reached. This term is often used in the context of fund manager compensation, which is performance based.

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Clients that are paying a performance based fee should be aware that investment advisors have an incentive to invest in riskier investments when paid a performance based fee due to the higher risk/higher reward attributes.

Performance fees are charged to Qualified Clients* only. "Qualified Client" pursuant to Texas Securities Board rule 116.13(b):

Any registered investment adviser who wishes to charge a fee based on a share of the capital gains or the capital appreciation of the funds or any portion of the funds of a client must comply with SEC Rule 205-3 (17 Code of Federal Regulations §275.205-3), which prohibits the use of such fee unless the client is a "qualified client." In general, a qualified client may include:
(1) a natural person or company who at the time of entering into such agreement has at least $1,000,000 under the management of the investment adviser; (2) a natural person or company who the adviser reasonably believes at the time of entering into the contract: (A) has a net worth of jointly with his or her spouse of more than $2,000,000; or (B) is a qualified purchaser as defined in the Investment Company Act of 1940, §2(a)(51)(A) (15 U.S.C. 80a-2(51)(A)); or (3) a natural person who at the time of entering into the contract is: (A) An executive officer, director, trustee, general partner, or person serving in similar capacity of the investment adviser; or (B) An employee of the investment adviser (other than an employee performing solely clerical, secretarial, or administrative functions with regard to the investment adviser), who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar function or duties for or on behalf of another company for at least 12 months.

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at NC or NC has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither NC, nor its management persons, has any relationship or arrangement with issuers of securities.

This brochure supplement provides information about Ravi Kumar V Devisetty that supplements the Nidhi Capital, LLC brochure. You should have received a copy of that brochure. Please contact Ravi Kumar V Devisetty, Managing Member if you did not receive Nidhi Capital, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Ravi Kumar V Devisetty is also available on the SEC's website at www.adviserinfo.sec.gov.

Nidhi Capital, LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

Ravi Kumar V Devisetty

Personal CRD Number: 5908746

Investment Adviser Representative

Nidhi Capital, LLC
141 Belle Maison Ln,
St Louis, Missouri, 63141
(636) 533-4886
ravi@nidhicapital.com
www.nidhicapital.com

UPDATED: 3/14/2025

Item 2: Educational Background and Business Experience

Name: **Ravi Kumar V Devisetty** **Born:** 1972

Education Background and Professional Designations:

Education:

MMS Finance, BITS Pilani – 1994
MBA Finance, Washington University– 2001

Business Background:

04/2012 – Present	Managing Member Nidhi Capital, LLC
02/2006 – 05/2012	Vice President IBrain Technologies Inc
08/2003 – 02/2011	Senior Vice President CitiMortgage
05/2002 – 07/2003	Senior Analyst First Banks Inc
07/1998 – 02/2002	Senior Consultant CapGemini Ernst & Young LLC

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Ravi Devisetty is the Manager of Nidhi Realty LLC & Clarkchester One Realty, LLC, Nidhi Gardens LLC real estate investment companies, and the President of Nidhitech Systems LLC. Ravi Devisetty spends approximately 15% of his time in that capacity and does not consider it to be his primary business.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Ravi Kumar V Devisetty does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Nidhi Capital, LLC.

Item 6: Supervision

As the only owner and representative of Nidhi Capital, LLC, Ravi Kumar V Devisetty supervises all duties and activities of the firm. Ravi Kumar V Devisetty's contact information is on the cover page of this disclosure document. Ravi Kumar V Devisetty adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

Item 7: Requirements For State Registered Advisers

This disclosure is required by Missouri securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

A. Ravi Kumar V Devisetty has **NOT** been involved in any of the events listed below.

  1. An award or otherwise being 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; or
     e) dishonest, unfair, or unethical practices.

  2. An award or otherwise being 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; or
     e) dishonest, unfair, or unethical practices.

B. Ravi Kumar V Devisetty has **NOT** been the subject of a bankruptcy petition at any time.

Nidhi Capital, LLC

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(636) 533-4886 ravi@nidhicapital.com

PRIVACY POLICY

Investment Advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or other Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the typical reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing – to offer our products and services to you;
- For joint marketing with other financial companies;
- For our affiliates' everyday business purposes – information about your transactions and experiences; or
- For non-affiliates to market to you.

Clients may opt out of sharing information for joint marketing to other financial companies, to our affiliates and to non-affiliates. If you are a new customer we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for affiliates' everyday business purposes – information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately at our address or telephone number if you choose to opt out of these types of sharing.

DEFINITIONS: Affiliates – companies related by common ownership or control. They can be financial and nonfinancial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.