

# FORM ADV PART 2A DISCLOSURE BROCHURE

## Enrich Finance, LLC

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July 22, 2025

This disclosure brochure ("Brochure") provides information about the qualifications and business practices of Enrich Finance, LLC (hereinafter "Enrich Finance," the "Firm," "we," "us," or similar designations). If you have any questions about the contents of the Brochure, please contact Enrich Finance at (415) 949-7080. The information in the Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Enrich Finance is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Enrich Finance, LLC ("Enrich Finance," "we," "us," or "our") is an investment adviser registering with the SEC. Registration with the SEC or any state securities authority does not imply any level of skill or training.

## Item 2. Material Changes

In this Item, Enrich Finance is required to discuss any material changes that have been made to the brochure since the last annual amendment. Enrich Finance has nothing to report in response to this Item since it is applying for initial registration with the SEC.

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## Item 4. Advisory Business

### Description of Enrich Finance

Enrich Finance was launched in January 2025 to provide the investment advisory services described below to its clients. Enrich Finance is primarily owned by Sameer Ramesh Kalwani and Gary Hiroyuki Button.

Prior to Enrich Finance rendering any of the foregoing advisory services, clients are required to enter into a written agreement with Enrich Finance setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

### **Description of Services**

Enrich Finance offers clients investment advisory services through an operational interactive website available at [www.enrichfinance.com](http://www.enrichfinance.com) designed to facilitate portfolio rebalancing and to take advantage of tax loss harvesting opportunities based on personalized information provided by clients about their investment portfolios, investment goals, and asset allocation targets (the “Platform”). Our recommendations are generated exclusively through a proprietary algorithm accessed through the Platform. No individualized advice or portfolio recommendations are made or delivered outside of the Platform.

Using data the client supplies about its current investment holdings, individual goals, and the target asset allocation for each goal, our proprietary optimization engine: (i) monitors drift away from the client-defined allocation and, when thresholds are breached, produces trade-level instructions that would restore the desired balance and (ii) identifies tax-loss harvesting (TLH) opportunities by scanning for unrealized losses that meet alert settings the client selects.

Enrich Finance does not provide guidance with respect to securities outside of the client’s existing portfolio.

All recommendations are presented for the client to review and accept or reject in the client’s sole discretion. We do not have trading authority and we do not place trades. As such, we cannot assure that proposed transactions will be executed, executed promptly, or executed at favorable prices. Delays in client implementation may cause our recommendations to no longer be accurate based on changes between the making of such recommendations and the date of implementation.

Any investment recommendations made by Enrich Finance are limited to publicly-available securities including individual stocks, bonds, mutual funds, exchange-traded funds (“ETFs”), and real estate investment trusts (“REITS”) that are already in the client’s portfolio.

As noted above, recommendations are tailored based on the investment holdings, goals, and target asset allocations chosen by the client.

### **Wrap Fee Programs**

Enrich Finance does not provide services through a wrap fee program.

### **Assets Under Management**

Because of the nature of our services, Enrich Finance does not maintain any assets under management as clients are solely responsible for managing their portfolios.

## **Item 5. Fees & Compensation**

Enrich Finance charges clients a subscription fee for its services. Clients can pay Enrich Finance a monthly subscription fee of \$5 per month or can elect for an annual subscription at a discounted rate of \$50 per year. The subscription fees are not impacted by portfolio size or composition. We charge fees for our advisory services monthly or annually in advance of providing our services based on the subscription option chosen by the client.

Clients can terminate their subscription at any time, but the Firm will not refund any fees paid by the client for the relevant billing period. The client's information will remain accessible through the Platform until the end of the billing period in which the client terminated its relationship with the Firm.

### **Fee Discretion**

We may elect, for various reasons, to waive or reduce our fees for certain clients including, among other things, when we test new services or features, to incentivize referrals from clients, or as an introductory offer.

### **Additional Fees and Expenses**

In addition to the advisory fees paid to Enrich Finance, clients will incur charges imposed by third parties in connection with the implementation of our recommendations, such as fund managers, broker-dealers, custodians, trust companies, banks, and other financial institutions (collectively "Financial Institutions"). These additional charges include, among others, securities brokerage commissions, mark-ups and mark-downs on fixed-income transactions, and other transaction costs; custodial fees; reporting charges; charges imposed directly by a mutual fund, ETF or REIT in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees, distribution fees, and other fund expenses); deferred sales charges; odd-lot differentials; transfer taxes; wire transfer and electronic fund fees; and other fees and taxes on brokerage accounts and securities transactions.

### **Direct Fee Debit**

Clients authorize payment of our fees by providing valid credit card information through a secure third-party payment integration powered by Stripe. The Stripe platform facilitates the authorization and payment process, but at no point does Enrich Finance have direct access to or retain client credit card information. All payment credentials are encrypted and stored securely by the payment processor in accordance with industry standards. Enrich Finance receives only limited transaction information sufficient to confirm payment and maintain accurate billing records.

## **Item 6. Performance-Based Fees & Side-by-Side Management**

Enrich Finance does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

## **Item 7. Types of Clients**

### **Types of Clients**

Enrich Finance offers investment management services to individuals (including high net worth individuals).

### **Minimum Account Requirements**

Enrich Finance's services begin at \$5 per month. Enrich Finance does not impose a minimum account size to work with Enrich Finance.

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

Investing in securities involves a risk of loss that clients should be prepared to bear. There is no guarantee that any specific investment or strategy will be profitable for a particular client.

### **Methods of Analysis and Investment Strategies**

Clients define their own investment goals and the target asset allocation for each goal. Our algorithm uses this information, coupled with information about the client's current investment portfolio, and provides alerts when client portfolios are out of line with their desired asset allocation targets.

Clients can set when they want rebalance alerts (when asset allocation is outside of thresholds from the target asset allocation), by indicating how sensitive they want these alerts (assign a relative rebalance sensitivity percentage).

When an alert is triggered, our algorithm will tell the client how much to sell of each security to bring their allocation back into balance based on their chosen target asset allocation(s). Rebalance recommendations also take into account expected income and return generated to provide recommendations on where to place each asset (e.g. municipal bonds are in taxable accounts, whereas REITs are in tax-advantaged accounts). Clients can make adjustments to this rebalance recommendation (e.g. avoid trades in taxable accounts or make a contribution to a specific account).

Once Clients are satisfied with the rebalance recommendation, they are then presented with a list of tasks they must perform at each broker to complete the rebalance and avoid wash sale rules and to implement the Specific Identification Method to help reduce tax implications on each trade.

With respect to identifying tax loss harvesting opportunities, clients can set the sensitivity for their tax loss harvesting alerts to identify how much percentage and \$ amount drops in an investment will trigger the THL recommendation.

## **Risk of Loss**

The following is a general description of risks associated with investment activities but does not purport to be a complete list of all such risk factors.

### General Economic Conditions

A client's portfolio could be adversely affected from time to time by such matters as changes in general economic, industrial and international conditions, changes in tax laws, prices and cost and other factors of a general nature. Geopolitical and other events (e.g., natural disasters, pandemics, war, terrorism, and trade wars) may disrupt securities markets and adversely affect global economies and markets, thereby decreasing the value of an account's investments. Sudden or significant changes in the supply or prices of commodities or other economic inputs such as oil may have material and unexpected effects on both global securities markets and individual countries, regions, sectors, companies, or industries, which could significantly reduce the value of an account's investments. War, terrorism and related geopolitical events have led, and in the future may lead, to increased short-term market volatility and may have adverse long-term effects on U.S. and world economies and markets.

### Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Enrich Finance's recommendations and/or investment decisions will depend to a great extent upon the future course of price movements of equity securities and other investments.

### Volatility Risks

The prices and values of investments can be highly volatile and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

### Interest-Rate Risks

Interest rates may fluctuate significantly, causing price volatility with respect to securities or instruments held by clients.

### Equity-Related Securities and Instruments

The value of equity securities varies in response to many factors. These factors include, without limitation, factors specific to an issuer and factors specific to the industry in which the issuer participates. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments, and the stock prices of such companies may suffer a decline in response. In addition, equity securities are subject to stock risk, which is the risk that stock prices historically rise and fall in periodic cycles. U.S. and non-U.S. stock markets have experienced periods of substantial price volatility in the past and may do so again in the future. In addition, investments in small-capitalization, mid-capitalization, and financially distressed companies may be subject to more abrupt or erratic price movements and may lack sufficient market liquidity, and these issuers often face greater business risks.

### Fixed Income Securities

Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations. Additionally, the value of fixed-income securities is impacted by factors such as interest rates as well as market and economic factors.

### Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for index-based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro-rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

### Real Estate Investment Trusts

The Firm may recommend an investment in various real estate investment trusts (“REITs”), the shares of which exist in the form of publicly-traded securities. REITs are collective investment vehicles with portfolios comprised primarily of real estate and mortgage related holdings. Many REITs hold heavy concentrations of investments tied to commercial and/or residential developments, which inherently subject REIT investors to the risks associated with a downturn in the real estate market. Investments linked to certain regions that experience greater volatility in the local real estate market may give rise to large fluctuations in the value of the vehicle’s shares. Mortgage related holdings may give rise to additional concerns pertaining to interest rates, inflation, liquidity and counterparty risk.

### Cybersecurity Risks

The information and technology systems of Enrich Finance and key service providers to Enrich Finance and its clients may be vulnerable to potential damage or interruption from computer viruses; network failures; computer and telecommunication failures; infiltration by unauthorized persons and security breaches; usage errors by their respective professionals; power outages; and catastrophic events such as fires, tornadoes, floods, hurricanes, and earthquakes. Although Enrich Finance has implemented various measures designed to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time, or cease to function properly, it may be necessary for Enrich Finance to make a significant investment to fix or replace them and to seek to remedy the effect of these issues. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in the operations of Enrich Finance or its clients’ accounts and result in a failure to maintain the security, confidentiality, or privacy of sensitive data, including personal information.

## **Item 9. Disciplinary Information**

Enrich Finance does not have any disciplinary actions to report in response to this item.

## **Item 10. Other Financial Industry Activities & Affiliations**

Enrich Finance does not have any other financial industry activities or affiliations to report in response to this item.

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

Enrich Finance has adopted a code of ethics in compliance with applicable securities laws (“Code of Ethics”) that sets forth the standards of conduct expected of its Supervised Persons. Enrich Finance’s Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the



use of material non-public information by Enrich Finance or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires the Firm's access persons to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings and limited offerings). However, Enrich Finance's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with Enrich Finance's policies and procedures.

Because all portfolio recommendations are generated by an algorithm and are not individually tailored or delivered through human advisers, Enrich Finance does not know in advance which securities the algorithm may recommend to any particular client, nor does it monitor or track whether, when, or how a client chooses to implement any recommendation. As a result, Enrich Finance does not restrict the personal securities transactions of its supervised persons based on potential conflicts with algorithm-generated client recommendations.

Enrich Finance and/or its supervised persons may buy or sell for their own accounts securities that may also be recommended to clients by the algorithm, or that clients may independently choose to buy or sell. Because Enrich Finance does not exercise trading discretion, does not receive real-time trade data from clients, and does not know when clients act on recommendations, we do not consider such activity to create a conflict of interest warranting trading restrictions.

Clients should be aware, however, that the potential for perceived conflicts of interest exists in any investment advisory relationship, and Enrich Finance maintains policies intended to ensure that all client recommendations are generated fairly and objectively, without regard to the personal holdings of the Firm or any supervised person.

A copy of our Code of Ethics is available to any client or prospective client by contacting the Firm at the phone number on the cover page of this Brochure.

## **Item 12. Brokerage Practices**

### **Recommendation of Broker-Dealers and Custodians for Client Transactions**

Because Enrich Finance does not manage assets on behalf of clients, it does not recommend or select any broker-dealers to be utilized by clients for execution of securities transactions.

### **Client Referrals from Brokers**

Enrich Finance does not consider whether broker-dealers provide client referrals because it does not recommend or select broker-dealers to be utilized by clients for execution of its recommendations.

### **Directed Brokerage**

Clients are solely responsible for selecting the broker-dealers to be utilized to implement the Firm's investment recommendations, if accepted by the client.

### **Trade Aggregation**

Enrich Finance does not aggregate or "block" trades for client accounts because it does not manage client assets.

## **Item 13. Reviews of Accounts**

### **Account Reviews**

Enrich Finance conducts reviews of client portfolios solely based on parameters selected by the client. Clients are alerted to recommendations based on their preferences.

### **Account Statements and Reports**

Enrich Finance does not provide clients with account statements or reports because it does not manage client assets on behalf of clients.

## **Item 14. Client Referrals & Other Compensation**

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

Enrich Finance does not receive economic benefits from third parties in connection with advisory services rendered to clients.

### **Compensation for Client Referrals**

Enrich Finance can provide clients with discounts on their subscription fees based on referrals of other clients to the Firm.

## **Item 15. Custody**

Enrich Finance is not deemed to have custody of any client funds or securities as such term is defined in Rule 206(4)-2 under the Investment Advisers Act of 1940.

## **Item 16. Investment Discretion**

Enrich Finance does not exercise discretionary authority over any client assets.

## **Item 17. Voting Client Securities (Proxy Voting)**

Enrich Finance does not take responsibility for voting proxies on behalf of its clients. Proxy materials will be sent directly by the custodian to the client, and Enrich Finance will not be responsible for answering questions pertaining to the voting of proxies.

## **Item 18. Financial Information**

Enrich Finance does not have any financial condition or impairment that would prevent Enrich Finance from meeting its contractual commitments to clients. Enrich Finance does not take physical custody of client funds or securities or serve as trustee or signatory for client accounts, and it does not require the prepayment of more than \$1,200 in fees six or more months in advance.

Enrich Finance has not filed a bankruptcy petition at any time in the past ten years.