

Item 1. Form ADV Part 2A

Firm Brochure – Form ADV Part 2A

Techbloom Inc. (iNRI)

855 Maude Ave
Mountain View, CA 94043
Website: goinri.com
Email: hemant@goinri.com

This Brochure provides information about the qualifications and business practices of Techbloom Inc. (hereinafter, “we,” “our,” the “Firm” or “iNRI”). iNRI operates the advisor services for the iNRI website. If you have any questions about the contents of this brochure, please contact us at the above email. 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. iNRI is a registered investment adviser. Registration as an investment adviser does not imply any special degree of skill or training, or any sort of approval by any regulatory authority of an adviser’s investment methods.

Additional information about iNRI can be found on the Investment Adviser Public Disclosure website at adviserinfo.sec.gov by using our identification number referred to as a CRD number. iNRI’s CRD No. is 333007. If you have any questions about the contact of this brochure, please contact us at the email address shown above.

Item 2. Material Changes

We have the following material changes to report. Material changes relate to iNRI's policies, practices or conflicts of interests.

For future filings, this section of the Disclosure Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this Brochure on the SEC’s public disclosure website (IAPD) at adviserinfo.sec.gov.

We may, at any time, update this Disclosure Brochure and send a copy to you with a summary of material changes, or send you only a summary of material changes that includes an offer to send you a copy of the full brochure either by electronic means (email) or in hard copy form.

If you would like another copy of this Disclosure Brochure, please download it from the SEC website as indicated above, download it from the iNRI website at goinri.com or contact our Chief Compliance Officer, Hemant Kumar Gangolia at hemant@goinri.com

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Item 4. Advisory Business and Services

A. Advisory Business

iNRI is an independent investment advisory firm registered as an internet-only investment adviser with the U.S. Securities and Exchange Commission ("SEC"). An internet-only investment adviser provides investment advice to all of its clients exclusively through an interactive website or app. The company was formed in 2023 as a Delaware Corporation. It is owned by Hemant Kumar Gangolia and Nishad Shah.

iNRI operates a website which targets Non-Resident Indians (NRIs) who are looking to invest in Indian markets. NRI is a term used to describe an Indian citizen (or someone of Indian origin) who lives outside of India. Through the iNRI website, NRIs, based on their risk profile and investment goals and criteria, may be connected to third-party wealth and asset managers to invest.

As iNRI operates a website through an internet investment advisor, clients will not be able to directly contact iNRI for investment advice. Clients may contact iNRI for technical and customer service issues via email at contact@goinri.com but not for investment advice.

B. Services

iNRI's advisory services are limited to offering individuals an interactive online platform at goinri.com, which employs a questionnaire to refer clients to third-party advisers. Clients bear the sole responsibility for deciding whether to engage with or retain an adviser. We do not engage in the management of any client's account with an adviser, nor do we offer advice on specific investments. We do not manage client assets. Our engagement with clients is limited to providing advice as to whether or not the client should retain a recommended adviser based upon information the client enters into our interactive website.

When opening an account for clients, iNRI will ask a series of questions regarding their financial situation and allow clients to set restrictions on their risk tolerance. Clients can update these preferences on iNRI's website. The questions cover topics such as investment objectives, investment horizon, downturn tolerance, and overall risk tolerance. Based on the client's suitability parameters, iNRI will limit referrals to certain advisers. iNRI will ask clients to review and update their answers to the questions on an annual basis. If the answers have changed so as to change iNRI's recommendation as to the retention of a specific adviser, iNRI will notify clients of this.

iNRI does not collect any additional information beyond what is covered in the questionnaire when determining these restrictions and providing referrals. The types of restrictions a client may impose include the level of risk they are willing to take.

Item 5. Fees and Compensation

iNRI does not charge any fees to clients, but rather charges a fee to third-party advisers to whom we refer clients. If a client decides to hire an adviser referred by iNRI, the third-party adviser will pay iNRI a percentage of the fee they charge the client.

Fee percentages are negotiated on a per-partner basis.

Clients may also incur certain fees or charges imposed by third parties, independent from iNRI, in connection with their investments.

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

Performance-based fees are based on a share of capital gains on or capital appreciation of the client's assets. Side-by-side management occurs when advisers manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee. We do not accept performance-based fees, nor do we engage in side-by-side management.

Item 7. Account Requirements and Types of Clients

Clients participating in advisory services include individuals, high net worth individuals, other investment advisors, and small businesses. There is no account minimum.

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

To match clients with third-party advisers and determine their financial situation, iNRI first gives clients a suitability questionnaire prior to onboarding:

- Investment experience
- Investment objective and time horizon
- Risk profile
- Detailed financial situation (income, assets, investment experience)
- Age
- Liquidity needs
- Risk Tolerance
- Specific financial goals

iNRI uses basic matching algorithms on its end utilizing a systematic approach to evaluate third-party investment advisers before referring them. Clients are notified to review/update their responses on an annual basis. Our methods of analysis include:

1. **Due Diligence Review:** Prior to offering any third party advisers on our platform, iNRI vets these firms by and conducting comprehensive background checks on advisers,

assessing their professional qualifications, industry experience, and disciplinary history through regulatory databases

2. **Risk Assessment:** Third-party advisers are given a low, medium, and high-risk rating by iNRI prior to listing on the platform. These ratings are used to filter/match clients for suitability purposes

Criteria Used in Our Selection Process

Our selection criteria for third-party advisers focus on:

1. **Regulatory Compliance:** Advisers must be properly registered and in good standing with relevant regulatory bodies, with no significant disciplinary actions.
2. **Fiduciary Responsibility:** Advisors are expected to act in the best interests of clients, adhering to fiduciary standards.

A. Risk of Loss

There are always risks to investing. All clients should be aware that all investments are subject to the potential loss of principal that clients should be prepared to bear.

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining our services.

Past performance of any Adviser does not guarantee future returns. Investing in securities and other financial products carries a risk of loss that clients should understand and be prepared to bear. Clients are advised to discuss these risks with their chosen third-party adviser, if applicable, and to obtain risk disclosures from any third-party adviser with whom they conduct business to ensure a full understanding of the investment risks involved.

There is cybersecurity risk with the increased use of technologies such as the Internet to conduct business. iNRI and its service providers are susceptible to operational, information security, and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyber-attacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cyber incidents affecting us or our service providers have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, impediments to trading, the inability of clients to transact business, violations of applicable privacy and other law. While both we and our service providers have established business continuity plans in the event of such cyber incidents, there are inherent limitations in such plans and systems including the possibility that certain risks have not been identified. Furthermore, we are unable to control the cyber security plans and systems put in place by our service providers or any other third parties whose operations may affect us and or its clients. As a result, iNRI and its clients could be negatively impacted.

Item 9. Disciplinary Information

iNRI is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures to report in response to this Item.

Item 10. Other Financial Industry Activities and Affiliations

iNRI does not have a related person that is:

- A broker/dealer, municipal securities dealer or government securities dealer or broker
- An investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- An investment adviser or financial planner
- A futures commission merchant, commodity pool operator or commodity trading advisor
- A banking or thrift institution
- An Accountant or accounting firm
- A lawyer or law firm
- An insurance company or agency
- A pension consultant
- A real estate broker or dealer
- A sponsor or syndicator of limited partnerships.

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

iNRI, its management, and supervised persons (collectively "personnel"), subscribe to a strict Code of Ethics. The Code of Ethics is designed to comply with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. The Firm's inherent fiduciary duty requires that the Firm act solely in its clients' best interest and adhere to standards of utmost integrity in its communications and transactions. These standards ensure that clients' interests are preeminent.

Accordingly, iNRI has implemented extensive policies, guidelines, and procedures that promote ethical practices and conduct by all of the Firm's personnel. The Firm's Code of Ethics specifies and prohibits certain types of transactions deemed to create conflicts of interest (or perceived conflicts of interest), as well as to establish reporting requirements and enforcement procedures relating to personal transactions by its personnel. The Code of Ethics, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes the Firm's ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. The Firm will provide a copy of the complete Code of Ethics to any client or prospective client upon request.

1. Proprietary Trading

iNRI and its representatives are permitted to buy or sell securities for their own accounts that the Firm also recommends to clients, consistent with the Firm's policies and procedures. This presents a conflict of interest because it may be possible for us or our representatives to receive more favorable prices than our clients. We will always document any transactions that could be construed as a conflict of interest. To mitigate this conflict of interest, we will monitor trading reports for adherence to our Code of Ethics.

2. Participation or Interest in Client Transactions

The Firm does not recommend that clients buy or sell securities in which it or a related person may have a material financial interest.

Item 12. Brokerage Practices

iNRI does not select or recommend broker-dealers or custodians. However, we do recommend third-party advisers who may be affiliated with these providers and may suggest them as part of a client's relationship with the adviser.

Item 13. Review of Accounts

iNRI is continuously accessible by clients through its website. We do not review accounts, as our advice is limited to whether or not the client should retain a recommended adviser based upon information the client enters into the operational interactive website. We do not review accounts that clients may maintain with the recommended third-party adviser.

Item 14. Client Referrals and Other Compensation

iNRI receives referral compensation from other advisers who we may refer clients to. We do currently engage in the use of client testimonials and endorsements relevant to the new Marketing Rule.

Item 15. Custody

iNRI does not manage client assets or invoice any fees to the client's bank account, so does not have custody of any client assets.

Item 16. Investment Discretion

iNRI does not have discretionary authority over client accounts.

Item 17. Voting Client Securities

iNRI does not participate in proxy voting on behalf of clients because we do not manage client assets.

Item 18. Financial Information

iNRI does not require or solicit the prepayment of more than \$1200 in fees six months or more in advance of services rendered. We do not have a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients and we have not been the subject of a bankruptcy petition at any time during the past ten years.