



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

November 8, 2019

Dirk Richter
Chief Executive Officer
GH Capital, Inc.
200 South Biscayne Blvd., Suite 2790
Miami, FL 33131

Re: GH Capital, Inc.
Preliminary Information Statement on Schedule 14C
Filed October 30, 2019
File No. 000-55798

Dear Mr. Richter:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Technology