

GHI, Inc.

DISCLOSURE BROCHURE

Dated October 24, 2013

Form ADV

Part 2A

Business Name: GHI, Inc.
Business Address: 4 Pine Court
Pomona, NY 10970

Web Address: None
Email Address: geraldhinmansr@gmail.com
Phone: (914)954-9663

This brochure provides information about the qualifications and business practices of GHI, Inc. If you have any questions about the contents of this brochure, please contact us at (914) 954- 9663 or geraldhinmansr@gmail.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. The use of the term "Registered Investment Advisor" does not imply a certain level of skill or training.

Additional information about GHI, Inc. also is available on the SEC's website at

www.adviserinfo.sec.gov.

Item 2 - Material Changes

Background:

On July 28, 2010, the United State Securities and Exchange Commission published Amendments to Form ADV which amend the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated October 24, 2013 is a new document prepared according to the SEC's new requirements and rules.

In the future, this Item will discuss only specific material changes that are made to the Brochure and we will provide clients with a summary of such changes. We will also reference the date of the last annual update of our brochure.

Pursuant to the new SEC Rules we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We will also provide other ongoing disclosure information about material changes as necessary, without charge.

We will provide you with a new Brochure as necessary based on changes or significant new information, at any time, without charge. You may also request a copy of this brochure by contacting us at (914) 954-9663 or geraldhinmansr@gmail.com.

Material Changes:

None

Item 3 - Table of Contents

Item 2 - Material Changes	2
Background.....	2
Item 3 - Table of Contents.....	3
Item 4 - Advisory Business.....	4
A. Firm Description/Principal Owner	4
B. Types of Advisory Services.....	4
C. Tailored Relationships	4
D. Wrap Fee Programs	4
E. Assets Under Management.....	4
Item 5 - Fees and Compensation.....	4
Solicitation Fee	4
Item 6 -Performance-Based Fees and Side-By-Side Management.	4
Item 7 -Types of Clients.....	5
Item 8 -Methods of Analysis, Investment Strategies, and Risk of Loss.....	5
Item 9 -Disciplinary Information.....	5
Hem 10 -Other Financial Industry Activities and Affiliations	5
Item 11 -Code of Ethics, Participation or Interest in Client Transactions and Personal Trading. 5	
Item 12 -Brokerage Practices	6
Item 13 -Review of Accounts.....	6
Item 14 -Client Referrals and Other Compensation.....	6
Item 15 -Custody	7
Item 16 -Investment Discretion	7
Item 17 -Voting Client Securities.....	7
Item 18 -Financial Information	7
Item 19 -Requirements for State-Registered Advisers.....	7

Item 4 - Advisory Business

A. Firm Description/Principal Owner

Upon completion of the registration process, GHI will be a New York State registered Investment Advisor providing advice to individual investors. GHI is a New York Limited Liability Company founded in 2013. The principal owner is Gerald H. Inman, Sr.

B. Types of Advisory Services

Investment Fund Management. The Advisor provides solicitation services for individual investors by using his experience to recommend active money managers.

C. Tailored Relationships

GHI will recommend investment advisory firms whose programs meet the needs and goals of the individual client. GHI will ensure that Clients will have the opportunity to place reasonable restrictions on investments which will be made on the client's behalf.

D. Wrap Fee Programs

GHI does not offer Wrap Fee Programs, but may recommend firms that do.

E. Assets Under Management

GHI has total assets under management of zero dollars.

Item 5 - Fees and Compensation

Solicitation Fees

GHI will receive Solicitation Fees from Registered Investment Advisory Firms pursuant to written Solicitation Agreements and will provide clients with a copy of GHI's Solicitor's Disclosure Document outlining the agreement with the particular firm, as well as the firm's disclosure document.

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

GHI does not charge performance-based fees and does not participate in side-by-side management.

Item 7-Types of Clients

GHI clients are primarily retirement age individuals in the "mass affluent" category, i.e., individuals with \$100,000 to \$2,500,000 of liquid financial assets.

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

GHI will provide Clients with a copy of the form ADV 2A of the firms recommended, which forms will outline the recommended advisors methods of analysis, investment strategies, and risk of loss.

Securities investments are not guaranteed and the client may lose money on investments. The client should be prepared to bear those losses. GHI asks that the client work with GHI to help GHI understand the client's tolerance for risk.

Item 9 - Disciplinary Information

GHI is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of the Advisor's advisory business or the integrity of the Advisor's management.

GHI and its management personnel have no reportable disciplinary events to disclose.

Item 10-Other Financial Industry Activities and Affiliations

GHI has no Other Financial Industry Activities or Affiliations.

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

GHI has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. GHI's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and sets forth GHI's practice of supervising the personal securities transactions of supervised persons with access to client information. Individuals associated with GHI may buy or sell securities for their personal accounts identical to or different than those recommended to clients. It is expressed policy of GHI that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on the investment decisions of advisory clients. All purchases are subject to holding period pursuant to the firm's policies and procedures.

To supervise compliance with its Code of Ethics, GHI requires that individuals associated with the firm who have access to non-public information regarding advisory recommendations or

transactions to advisory client accounts provide annual securities holdings reports and monthly statements (or quarterly, if no monthly statement is generated) to the firm's Chief Compliance Officer. GHI requires such access persons to also receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

GHI requires that all individuals act in accordance with all applicable Federal securities laws. GHI's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. Any individual not in observance of the above may be subject to discipline. GHI will provide a complete copy of its Code of Ethics to any client upon written request to the Chief Compliance Officer at GHI's principal address.

Item 12– Brokerage Practices

- I. Research and other Soft Dollar Benefits. GHI does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.
2. Brokerage for Client Referrals. GHI does not receive client referrals from broker/dealers.
3. Directed Brokerage. GHI does not direct brokerage and will rely on the policies of the firms to which it refers clients, and will provide clients with that firm's Disclosure Document.

Item 13– Review of Accounts

GHI will rely on the review policies of the firms to which it refers clients, and will provide clients with that firm's Disclosure Document.

Item 14- Client Referrals and Other Compensation.

GHI may enter into solicitation agreements through which it will receive compensation for referring clients to other investment advisory programs. Vendors or sub-advisors used by GHI may pay for training and marketing support to assist GHI in considering and recommending its products. These sub-advisors may also grant GHI access to their web site and provide discounted software, sample investment calculators, and other forms used by GHI in the routine conduct of its business.

Where GHI acts a solicitor, the firm will refer investors to other advisors and receive a referral fee for doing so. The firm currently has no formal arrangements to solicit on behalf of other advisors. Where it does so, however, GHI will provide a separate disclosure statement describing the arrangement and the compensation to be paid to GHI. The client will also receive the other advisors disclosure documents. In all cases, solicitation fees or sub-Program Fees are paid out of the advisor's stated management fee; clients do not pay an additional fee to GHI and the fees charged are not otherwise increased.

Item 15–Custody

GHI does not take custody of client's funds and it therefore does not issue accounts statements, although it may generate some account documentation for use at client meetings. Clients should receive account statements from the qualified custodian that holds and maintains client's investment assets on at least a quarterly basis. GHI urges clients to carefully review these statements.

Item 16–Investment Discretion

GHI will rely on the Investment Discretion policies of the firms to which it refers clients, and will provide clients with that firm's Disclosure Document.

Item 17 –Voting Client Securities

GHI will rely on the Proxy Voting policies of the firms to which it refers clients, and will provide clients with that firm's Disclosure Document.

Item 18-Financial Information

GHI does not require or solicit prepayment of more than \$1,200.00 in fees per client, six months or more in advance.

GHI has never been the subject of a bankruptcy petition.

Item 19-Requirements for State-Registered Advisers

- A. Principal executive and management person -Gerald H. Inman, Sr. Please see ADV Part 2B for details.
- B. Neither GHI nor its principals are engaged in other business activities.
- C. Neither GHI nor its principals are compensated with performance-based fees.
- D. Neither GHI nor its management persons were found liable for any arbitration claims or in civil, self-regulatory organizations, or administration proceedings.
- E. Neither GHI nor its management persons have any relationship or arrangement with any issuer of securities.