

DIVIDEND NOTICE

THE COMSTOCK FUNDS, INC. - COMSTOCK STRATEGY FUND

FOR IMMEDIATE RELEASE
Rye, New York
September 28, 2004

The Comstock Funds announced its quarterly distribution from net investment income for the Comstock Strategy Fund. The dividend is payable on September 28, 2004 to shareholders of record on September 27, 2004. The ex-dividend, payment and reinvestment date is September 28, 2004.

	<u>Distribution (per share)</u>
Class O (Fund# 1791)	\$0.0076
Class A (Fund# 1789)	\$0.0038
Class C (Fund# 1790)	None

The Comstock Funds are managed by Gabelli Funds, LLC and distributed by Gabelli & Company, Inc., subsidiaries of Gabelli Asset Management Inc., which is a publicly traded NYSE listed company.

For further information call Bruce N. Alpert at 914-921-5105 or 1-800-GABELLI (1-800-422-3554).