

DIVIDEND NOTICE

THE COMSTOCK FUNDS, INC. - COMSTOCK STRATEGY FUND

FOR IMMEDIATE RELEASE
Rye, New York
October 29, 2003

The Comstock Funds announced that there is no monthly distribution from net investment income for the Comstock Strategy Fund for October 2003.

	<u>Distribution (per share)</u>
Class O (Fund# 1791)	None
Class A (Fund# 1789)	None
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).