

DIVIDEND NOTICE

THE COMSTOCK FUNDS, INC. - COMSTOCK STRATEGY FUND

FOR IMMEDIATE RELEASE

Rye, New York

May 28, 2003

The Comstock Funds announced the monthly distribution from net investment income for the Comstock Strategy Fund. The dividend is payable on May 28, 2003 to shareholders of record on May 27, 2003. The ex-dividend, payment and reinvestment date is May 28, 2003.

| | <u>Distribution (per share)</u> |
|----------------------|---------------------------------|
| Class O (Fund# 1791) | \$0.00503 |
| Class A (Fund# 1789) | \$0.00422 |
| Class C (Fund# 1790) | \$0.00166 |

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).