

DIVIDEND NOTICE

THE COMSTOCK FUNDS, INC. - COMSTOCK STRATEGY FUND

FOR IMMEDIATE RELEASE
Rye, New York
March 29, 2005

There is no distribution for any of the classes of Comstock Strategy Fund this quarter.

	<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).