

BUSINESS CONTINUITY

Summary Disclosure Statement

Gabelli & Company, Inc. (“Gabelli”) acts as an introducing brokerage firm. We accept and enter orders. The securities clearing function, back-office and trade support for your account is provided by our clearing firms, First Clearing Corp. (“First Clearing”) and Bear Stearns Securities Corp. (“Bear Stearns”). Gabelli does not hold client funds or securities. Your assets are maintained at First Clearing or Bear Stearns, and copies of their business continuity disclosures are available at their websites (www.firstclearingllc.com; www.globalclearing.com). Gabelli is providing this disclosure to you to provide information about our efforts to ensure that your account is not materially affected as a result of a significant business disruption.

Securities industry regulations require each member firm to create and maintain a business continuity plan tailored to the size and need of the member and reasonably designed to meet its existing obligations to its clients or other counterparties. In accordance with these requirements, Gabelli, in conjunction with its parent company, GAMCO Investors, Inc., has designed a business continuity plan to address possible scenarios in an effort to minimize any service impact to our clients.

In keeping with the regulatory requirements, the business continuity plan for Gabelli is designed to address key areas of concern – including, but not limited to, the following:

- Data back-up and recovery;
- All mission critical systems;
- Financial and operational assessments;
- Alternative means of communications between the firm, its employees, clients and regulators;
- Alternative physical location for employees;
- Critical business constituent, bank and counter-party contacts;
- Regulatory reporting; and
- How Gabelli will ensure that its clients have access to their funds and securities in the event Gabelli determines it is unable to continue its business.

The primary Gabelli location in Rye, NY is equipped with a stand-alone gas generator, capable of powering the data center and trading floor, permitting the maintenance of essential functions in the event of a loss of power. In the event that the primary location in Rye, NY is rendered uninhabitable or inaccessible, the firm has a plan in place to relocate key employees to another facility maintained by Gabelli in Greenwich, CT. This alternate site is available 24 hours a day, 7 days a week, and maintains equipment, systems and back-up data to enable Gabelli to continue the essential functions which are described in the firm’s business continuity plan, and referenced above, using the servers located in Rye, NY. The business continuity plan provides that essential operations can be re-established at the alternate site within a period of 4 hours from the time of a business disruption.

In the event of a citywide or regional disruption that affects other major service providers or the securities markets, we will maintain operations in Rye to the extent feasible, and continue to service client accounts pending recovery from the disruption.

The Gabelli business continuity plan is reviewed, updated and tested on an annual basis. In addition, we seek and obtain assurances from First Clearing, Bear Stearns, third-party vendors of mission critical systems, and other third-party service providers to ensure that, in the event of a business disruption, these third-parties will be able to continue to provide services to us so that we can maintain our critical business functions.

In the event of a business disruption, information concerning access to your funds and securities will be made available by telephone at 1-914-921-5100, and on our website, www.gabelli.com.

