

GABELLI FUNDS

CERTIFICATION REGARDING BENEFICIAL OWNERS OF LEGAL ENTITY CUSTOMERS

I. GENERAL INSTRUCTIONS

What is this form?

To help the government fight financial crime, federal regulation requires certain financial institutions to obtain, verify, and record information about the beneficial owners of legal entity customers. Legal entities can be abused to disguise involvement in terrorist financing, money laundering, tax evasion, corruption, fraud, and other financial crimes. Requiring the disclosure of key individuals who ultimately own or control a legal entity (i.e., the beneficial owners) helps law enforcement investigate and prosecute these crimes.

Who has to complete this form?

This form must be completed by the person opening a new account on behalf of a legal entity with any of the following U.S. financial institutions: (i) a bank or credit union; (ii) a broker or dealer in securities; (iii) a mutual fund; (iv) a futures commission merchant; or (v) an introducing broker in commodities.

For the purposes of this form, a legal entity includes a corporation, limited liability company, partnership, and any other similar business entity formed in the United States or a foreign country.

What information do I have to provide?

This form requires you to provide the name, address, date of birth and social security number for the following individuals (i.e., the **beneficial owners**):

- (i) Each individual, if any, who owns, directly or indirectly, 25 percent or more of the equity interests of the legal entity customer (e.g., each natural person that owns 25 percent or more of the shares of a corporation); **and**
- (ii) An individual with significant responsibility for managing the legal entity customer (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President or Treasurer).

II. CERTIFICATION OF BENEFICIAL OWNER(S)

Persons opening an account or maintaining a business relationship on behalf of a legal entity must provide the following information:

Account open/maintenance information

A. Name of Person opening account or maintaining the Business Relationship

B. Name of Legal Entity for which the account is being opened/maintained

C. The following information for each individual, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25 percent or more of the equity interests of the legal entity listed above. If no individual meets this definition, please check "Beneficial Owner Not Applicable" below and skip this section.

Beneficial Owner Not Applicable

- For a person with a Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN), provide the (SSN/ITIN) and leave Primary ID Type, Description and ST/Ctry/Prov blank.

- For a foreign person without a (SSN/ITIN), provide a Passport Number and Country of Issuance. In lieu of a passport, foreign persons may also provide a U.S. government-issued Alien ID or other foreign government-issued documents evidencing nationality or residence and bearing a photograph or similar safeguard.

BENEFICIAL OWNER 1 INFORMATION: _____% OF OWNERSHIP

Individual Name

Street Address

Date of Birth

Address Line 2

SSN ITIN Number _____

TIN Type

Address Line 3

BENEFICIAL OWNER 2 INFORMATION: _____% OF OWNERSHIP

Individual Name

Street Address

Date of Birth

Address Line 2

SSN ITIN Number _____

TIN Type

Address Line 3

BENEFICIAL OWNER 3 INFORMATION: _____% OF OWNERSHIP

Individual Name

Street Address

Date of Birth

Address Line 2

SSN ITIN Number _____

TIN Type

Address Line 3

BENEFICIAL OWNER 4 INFORMATION: _____% OF OWNERSHIP

Individual Name

Street Address

Date of Birth

Address Line 2

SSN ITIN Number _____

TIN Type

Address Line 3

D. The following information for one individual with significant responsibility for managing the legal entity listed above, such as:

- An executive officer or senior manager (e.g., Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, Treasurer); or
- Any other individual who regularly performs similar functions.

(If appropriate, an individual listed under section (C) above may also be listed in this section (D)).

INDIVIDUAL WITH CONTROL INFORMATION

Individual Name

Street Address

Date of Birth

Address Line 2

SSN ITIN Number _____

TIN Type

Address Line 3

CERTIFIED, AGREED TO

I, _____ hereby certify, to the best of my knowledge, that the information provided above is complete and correct
Print Name

Signature

Date

*Please send the completed form and the Gabelli Funds Account application to:
Gabelli Funds, P.O. Box 8308, Boston, MA 02266-8308*