

SECURITIES AND EXCHANGE COMMISSION

FORM NSAR-A

Semi-annual report for management companies filed on Form N-SAR

Filing Date: **1996-12-30** | Period of Report: **1996-10-31**  
SEC Accession No. **0000830779-96-000006**

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FILER

**COMSTOCK PARTNERS FUNDS INC**

CIK: **830779** | IRS No.: **133454481** | State of Incorporation: **MD** | Fiscal Year End: **0430**  
Type: **NSAR-A** | Act: **40** | File No.: **811-05502** | Film No.: **96687998**

Mailing Address

*10 EXCHANGE PLACE  
SUITE 2010  
JERSEY CITY NJ 07302-3913*

Business Address

*10 EXCHANGE PLACE  
SUITE 2010  
NEW JERSEY NJ 07302-3913  
2129439100*

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<CIK> 0000830779

<NAME> COMSTOCK PARTNERS FUNDS, INC.

<SERIES>

<NUMBER> 03

<NAME> COMSTOCK PARTNERS CAPITAL VALUE FUND -  
CLASS C

<MULTIPLIER> 1000

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<SERIES>

<NUMBER> 04

<NAME> COMSTOCK PARTNERS CAPITAL VALUE FUND -  
CLASS R

<MULTIPLIER> 1000

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<SERIES>

<NUMBER> 05

<NAME> COMSTOCK PARTNERS STRATEGY FUND - CLASS O

<MULTIPLIER> 1000

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<NAME> COMSTOCK PARTNERS FUNDS, INC.

<SERIES>

<NUMBER> 06

<NAME> COMSTOCK PARTNERS STRATEGY FUND - CLASS A

<MULTIPLIER> 1000

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<CIK> 0000830779

<NAME> COMSTOCK PARTNERS FUNDS, INC.

<SERIES>

<NUMBER> 07

<NAME> COMSTOCK PARTNERS STRATEGY FUND - CLASS C

<MULTIPLIER> 1000

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<INVESTMENTS-AT-VALUE>	233068
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<DIVIDEND-INCOME>	588
<INTEREST-INCOME>	9960
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<NET-INVESTMENT-INCOME>	8871
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