

Edgar Filing: GABELLI EQUITY TRUST INC - Form 40-17G

GABELLI EQUITY TRUST INC

Form 40-17G

December 21, 2007

David James
PFPC Inc.
Vice President and Counsel
99 High Street, 27th Floor
Boston, MA 02110
(617) 338-4595
(617) 338-4864 - fax

December 20, 2007

VIA EDGAR

Securities and Exchange Commission
100 F Street NE
Washington, D.C. 20549

| | | |
|-----|---|--|
| RE: | The Gabelli Asset Fund File Nos.: 33-1719/811-4494 | GAMCO International Growth Fund, Inc. File Nos.: 33-79994/811-08560 |
| | The Gabelli Blue Chip Value Fund File Nos.: 333-80099/811-09377 | Gabelli Investor Funds, Inc. File Nos.: 33-54016/811-07326 |
| | Gabelli Capital Series Funds, Inc. File Nos.: 33-61254/811-7644 | The GAMCO Mathers Fund File Nos.: 002-23727/811-01311 |
| | Comstock Funds, Inc. File Nos.: 33-40771/811-05502 | The Gabelli Global Utility & Income File Nos.: 333-113621/811-21529 |
| | The Gabelli Convertible and Income Securities Fund Inc. File Nos.: 333-24541/811-05715 | |
| | Gabelli Equity Series Funds, Inc. File Nos.: 33-41913/811-06367 | The Gabelli Money Market Funds File Nos.: 33-48220/811-6687 |
| | The Gabelli Equity Trust Inc. File Nos.: 33-42780/811-4700 | The Gabelli Dividend & Income Trust File Nos.: 333-126480/811-21423 |
| | The Gabelli Global Deal Fund File No. 333-138141/811-21969 | The Gabelli Utilities Fund File Nos.: 333-81209/811-09397 |
| | The Gabelli Global Multimedia Trust Inc. File Nos.: 333-25487/811-08476 | The Gabelli Utility Trust File Nos.: 333-72983/811-09243 |
| | GAMCO Global Series Funds, Inc. File Nos.: 33-66262/811-07896 | The Gabelli Value Fund Inc. File Nos.: 33-30139/811-5848 |
| | GAMCO Gold Fund, Inc. File Nos.: 33-79180/811-08518 | The Westwood Funds File Nos.: 33-06790/811-04719 |
| | The GAMCO Growth Fund File Nos.: 33-10583/811-4873 | The Gabelli Healthcare & WellnessRx File Nos.: 333-140966/811-22021 |
| | The Gabelli Global Gold, Natural Resources & Income Trust FILE Nos.: 333-121998/811-21698 | The Gabelli SRI Fund, Inc. File Nos.: 333-141093/811-22026 (THE "FUNDS") |

Dear Staff Member:

Pursuant to Rule 17g-1(g)(1) under the Investment Company Act of 1940, as amended, enclosed for filing on behalf of the above-referenced Funds please find (i) one copy of a rider for an increase in coverage for their joint fidelity bond (the "Joint Bond") for the policy period from December 7, 2006 to December 7, 2007, such policy being maintained through National Union Fire Insurance Company, (ii) an Assistant Secretary's Certificate certifying the resolutions adopted by each Fund's Board Members approving the amount, type, form and coverage of the Joint Bond and the portion of the premium to be paid by

Edgar Filing: GABELLI EQUITY TRUST INC - Form 40-17G

the Funds and (iii) the Amended and Restated Joint Insured Agreement among the Funds and the other insureds on the Joint Bond.

The Joint Bond premium allocation for the increase in coverage for these Funds has already been paid.

Very truly yours,

/S/ DAVID JAMES

David James
Assistant Secretary

Enclosures

ASSISTANT SECRETARY'S CERTIFICATE

I, David James, Assistant Secretary of The Gabelli Asset Fund, The Gabelli Blue Chip Value Fund, Gabelli Capital Series Funds, Inc., Comstock Funds, Inc., The Gabelli Convertible and Income Securities Fund Inc., The Gabelli Dividend & Income Trust, Gabelli Equity Series Funds, Inc., The Gabelli Equity Trust Inc., The Gabelli Global Deal Fund, The Gabelli Gold, Natural Resources & Income Trust, The Gabelli Global Multimedia Trust Inc., GAMCO Global Series Funds, Inc., The Gabelli Global Utility & Income Trust, GAMCO Gold Fund, Inc., The GAMCO Growth Fund, The Gabelli Healthcare & WellnessRx Trust, GAMCO International Growth Fund, Inc., Gabelli Investor Funds, Inc., The GAMCO Mathers Fund, The Gabelli Money Market Funds, The Gabelli SRI Fund, Inc., The Gabelli Utilities Fund, The Gabelli Utility Trust, The Gabelli Value Fund Inc. and The Gabelli Westwood Funds (the "Funds"), hereby certify that the following resolutions have been adopted first by those Board Member who are not considered to be "interested persons," as defined in the Investment Company Act of 1940, as amended (the "1940 Act") ("Independent Board Members") voting separately, and then by the entire Board of each Fund, at a meeting duly called and held on November 13, 2007:

RESOLVED,

That after having given due consideration to all relevant factors, the Board Members, including all of the Independent Board Members, hereby approve the amendment to the existing joint fidelity bond coverage with National Union Fire Insurance Company, and ratify, confirm and approve an increase in the amount of coverage under said joint fidelity bond from \$23,025,000 to \$24,600,000 effective as of November 13, 2007; and further

RESOLVED,

That the portion of the increased premium for the aforementioned joint insured fidelity bond to be paid by the Fund, if any, is hereby approved, taking into consideration, among other things, the number of parties named as insureds; the nature of the business activities of such other parties; the amount of the joint insured bond; the amount of the premium for such bond; the ratable allocation of the premium among all parties named as insureds;

Edgar Filing: GABELLI EQUITY TRUST INC - Form 40-17G

and the extent to which the share of the premium allocated to the Fund is less than the premium the Fund would have had to pay if it had provided and maintained a single insured bond; and further

RESOLVED,

That the Assistant Secretary of the Fund is hereby authorized and directed to prepare, execute and file such supplements to the fidelity bond, and to take such action as may be necessary or appropriate in order to conform the terms of the fidelity bond coverage to the provisions of the 1940 Act, and the rules and regulations promulgated thereunder.

IN WITNESS WHEREOF, the undersigned has hereunto set his hand this 20th day of December, 2007.

/S/ DAVID JAMES

 David James
 Assistant Secretary

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA

Rider No. 13

To be attached to and form part of Investment Company Blanket Bond No. 6214219 in favor of The Gabelli Funds, et al.

1. In consideration of the additional premium of \$737.00, it is hereby understood and agreed that Item 3 of the Declaration Page is deleted in its entirety and replaced with the following:

ITEM 3 Limit of Liability - Subject to Section 9, 10, and 12 hereof:

| | | Limit of Liability | Deductibl |
|----------------------|-------------------------------------|--------------------|-----------|
| Insuring Agreement A | - FIDELITY | \$24,600,000 | |
| Insuring Agreement B | - AUDIT EXPENSE | \$25,000 | |
| Insuring Agreement C | - ON PREMISES | \$24,600,000 | |
| Insuring Agreement D | - IN TRANSIT | \$24,600,000 | |
| Insuring Agreement E | - FORGERY OR ALTERATION | \$24,600,000 | |
| Insuring Agreement F | - SECURITIES | \$24,600,000 | |
| Insuring Agreement G | - COUNTERFEIT CURRENCY | \$24,600,000 | |
| Insuring Agreement H | - STOP PAYMENT | \$25,000 | |
| Insuring Agreement I | - UNCOLLECTIBLE ITEMS OF DEPOSIT | \$25,000 | |

OPTIONAL COVERAGES ADDED BY RIDER:

| | | |
|----------------------|---------------------------|--------------|
| Insuring Agreement J | - COMPUTER SYSTEMS | \$24,600,000 |
| Insuring Agreement K | - UNAUTHORIZED SIGNATURES | \$25,000 |
| Insuring Agreement L | - AUTOMATED PHONE SYSTEMS | \$24,600,000 |
| Insuring Agreement M | - TELEFACSIMILE | \$24,600,000 |

Edgar Filing: GABELLI EQUITY TRUST INC - Form 40-17G

If "Not Covered" is inserted above opposite any specified Insuring Agreement or Coverage, such Insuring Agreement or Coverage and any other reference thereto in this bond shall be deemed to be deleted therefrom.

2. Nothing herein shall be held to vary, alter, waive or extend any of the terms, limitations, conditions or provisions of the attached bond other than as above stated.

3. This rider shall become effective as of 12:01 a.m. on 09/30/07 standard time as specified in the attached bond.

By:

Authorized Representative

AMENDED AND RESTATED

JOINT INSURED AGREEMENT

AGREEMENT dated December 1, 1999, as most recently amended as of May 15, 2007, among the registered investment companies advised by Gabelli Funds, LLC, Gabelli Advisers, Inc. and Gabelli Fixed Income LLC (together, the "Advisers") which are listed on Schedule A attached hereto (collectively, the "Funds").

WHEREAS, each of the Funds is named as an insured in an investment company blanket bond (the "Fidelity Bond") which is intended to be in full compliance with Rule 17g-1 under the Investment Company Act of 1940, as amended; and

WHEREAS, the Funds desire to enter into an agreement in order to meet the requirements of Rule 17g-1 and to assure that premiums payable with respect to the Fidelity Bond and payments by the Insurer with respect to the Fidelity Bond are allocated in a fair and equitable manner;

Now, THEREFORE, the Funds do hereby agree as follows:

1. Each Fund shall maintain a minimum amount of fidelity insurance one level higher than that specified for its asset size by the table contained in Rule 17g-1(d) (the "Minimum Insurance"). Each Fund shall aggregate the assets of all of its series to calculate the amount of coverage required by Rule 17g-1(d). Notwithstanding the foregoing, no Fund shall be required to increase the amount of its fidelity insurance unless and until the aggregate amount of fidelity insurance maintained by the Funds exceeds the aggregate amount of fidelity insurance the Funds are required to maintain pursuant to the table contained in Rule 17g-1(d) by \$2 million or less.

2. The allocation of the premium to each Fund shall be based on the proportionate share of the sum of the premiums that would have been paid if fidelity insurance was purchased separately by the Funds, and will be based upon the relative Minimum Insurance percentages of the Funds as of the quarter ending prior to the beginning of the first month in the period for which the coverage is obtained, subject to paragraph 4 below.

3. Each Fund is guaranteed a minimum coverage amount with access to the remainder of the total coverage of the Fidelity Bond. In the event that any recovery is received under the Fidelity Bond as a result of the loss sustained by two or more Funds, each Fund shall receive an equitable and proportionate share of the recovery, but in no event less than the amount it would have

Edgar Filing: GABELLI EQUITY TRUST INC - Form 40-17G

received had it maintained a single insured bond with minimum coverage.

4. Each Fund may, at any time, increase its allocation described in paragraph 2 upon payment of the premium required for such additional insurance provided that the face amount of the Fidelity Bond can increase accordingly or be supplemented by a policy of excess insurance.

5. Any other registered investment company or additional series of such an investment company for which the Advisers or their affiliates serves as investment adviser ("Additional Fund") may become a party to this Agreement by executing a copy of this Agreement (a copy of which will be furnished to each of the Funds) and by paying the premium for any required increase in the amount of the Fidelity Bond if the underwriter of the Fidelity Bond is willing to add such Additional Fund as an additional insured and increase the amount of total coverage by the amount of the Minimum Insurance required for such Additional Fund by the provisions hereof.

6. The Agreement shall remain in effect for as long as two or more of the Funds (including any Additional Fund) are insured under the terms of the Fidelity Bond. Any Fund shall, however, have the right to terminate, at any time, its participation in the Fidelity Bond and in this Agreement provided that losses incurred prior to such termination shall be governed by the provision of this Agreement and the amount of any return premium to which such Fund shall be entitled will be limited to the amount actually obtained from the underwriter in respect of such termination.

Signed: /S/ BRUCE N. ALPERT
Bruce N. Alpert

President, The Gabelli Asset Fund
President, The Gabelli Blue Chip Value Fund
President, Gabelli Capital Series Funds, Inc.
Executive Vice President, Comstock Funds, Inc.
President, The Gabelli Convertible and Income Securities Fund Inc.
President, The Gabelli Dividend & Income Trust
President, Gabelli Equity Series Funds, Inc.
President, The Gabelli Equity Trust Inc.
President, The Gabelli Global Deal Fund
President, The Gabelli Global Gold, Natural Resources & Income Trust
President, The Gabelli Global Multimedia Trust Inc.
President, GAMCO Global Series Funds, Inc.
President, The Gabelli Global Utility & Income Trust
President, GAMCO Gold Fund, Inc.
President, The GAMCO Growth Fund
President, GAMCO International Growth Fund, Inc.
President, Gabelli Investor Funds, Inc.
Executive Vice President, The GAMCO Mathers Fund
President, The Gabelli Money Market Funds
President, The Gabelli SRI Fund, Inc.
President, The Gabelli Utilities Fund
President, The Gabelli Utility Trust
President, The Gabelli Value Fund Inc.
President, The Westwood Funds

Signed: /S/ AGNES MULLADY
Agnes Mullady
President, The Gabelli Healthcare & Wellness(Rx) Trust

SCHEDULE A

Edgar Filing: GABELLI EQUITY TRUST INC - Form 40-17G

LIST OF REGISTERED INVESTMENT COMPANIES

- The Gabelli Asset Fund
- The Gabelli Blue Chip Value Fund
- The Gabelli Convertible Securities and Income Securities Fund Inc.
- The Gabelli Dividend & Income Trust
- The Gabelli Equity Trust Inc.
- The Gabelli Global Deal Fund
- The Gabelli Global Gold, Natural Resources & Income Trust
- The Gabelli Healthcare & Wellness(Rx) Trust
- The Gabelli Global Multimedia Trust Inc.
- The Gabelli Global Utility & Income Trust
- GAMCO Gold Fund, Inc.
- The GAMCO Growth Fund
- GAMCO International Growth Fund, Inc.
- The GAMCO Mathers Fund
- The Gabelli SRI Fund, Inc.
- The Gabelli Utilities Fund
- The Gabelli Utility Trust
- The Gabelli Value Fund Inc.

GABELLI CAPITAL SERIES FUNDS, INC.:

- The Gabelli Capital Asset Fund

COMSTOCK FUNDS, INC.

- Comstock Capital Value Fund
- Comstock Strategy Fund

GABELLI EQUITY SERIES FUNDS, INC.:

- The Gabelli Equity Income Fund
- The Gabelli Small Cap Growth Fund
- The Gabelli Woodland Small Cap Value Fund

GAMCO GLOBAL SERIES FUNDS, INC.:

- The GAMCO Global Telecommunications Fund
- The GAMCO Global Convertible Securities Fund
- The GAMCO Global Growth Fund
- The GAMCO Global Opportunity Fund

GABELLI INVESTOR FUNDS, INC.:

- The Gabelli ABC Fund

THE GABELLI MONEY MARKET FUNDS:

- The Gabelli U.S. Treasury Money Market Fund

THE WESTWOOD FUNDS:

- Westwood Equity Fund
- Westwood Intermediate Bond Fund
- Westwood Balanced Fund
- Westwood SmallCap Equity Fund
- Westwood Income Fund
- Westwood Mighty Mites Fund

May 15, 2007