SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

SCHEDULE 13D

Under the Securities Exchange Act of 1934 (Amendment No. 21)

Griffon Corporation (Name of Issuer)

Common Stock (Title of Class of Securities)

398433102

(CUSIP Number)

David Goldman GAMCO Investors, Inc. One Corporate Center Rye, New York 10580-1435 (914) 921-5000

(Name, Address and Telephone Number of Person Authorized to Receive Notices and Communications)

November 14, 2019
(Date of Event which Requires Filing of this Statement)

If the filing person has previously filed a statement on Schedule 13G to report the acquisition that is the subject of this Schedule 13D, and is filing this schedule because of $\S\S 240.13d-1(e)$, 240.13d-1(f) or 240.13d-1(g), check the following box .

1

CUSIE	P No. 398433102					
1	Names of reporting persons					
	I.R.S. identification nos. of above persons (entities only)					
			VD N. 40 4044500			
2	Gabelli Funds, LLC	v if a mambay of a group (I.D. No. 13-4044523			
2	Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (a)					
			(b)			
3	Sec use only					
4	Source of funds (SEE INSTRUCTIONS)					
	00-Funds of investment advisory clients					
5	Check box if disclosure of	legal proceedings is requi	red pursuant to items 2 (d) or 2 (e)			
6	Citizenship or place of org	 ganization				
	New York	,				
	Number Of	: 7	Sole voting power			
	Shares	; ;	1,974,000 (Item 5)			
	Situres	· :	1,07 1,000 (21cm 5)			
	Beneficially	: 8	Shared voting power			
	Od	:				
	Owned	:	None			
	By Each	<u>:</u> : 9	Sole dispositive power			
		:	· · · · · · · · · · · · · · · · · · ·			
	Reporting	:	1,974,000 (Item 5)			
	Person	:10	Chaved dispositive payor			
		:10	Shared dispositive power			
	With	:	None			
		:				
11	Aggregate amount beneficially owned by each reporting person					
	1,974,000 (Item 5)					
	1,57 1,000 (11111 5)					
12		e amount in row (11) exclu	ides certain shares			
	(SEE INSTRUCTIONS)					
13	Percent of class represented by amount in row (11)					
10	rescent of class represented by anifolint in row (11)					
	4.22%					
14	Time of war and a second	CEE INCEDITORIONS				
14	Type of reporting person (IA, CO	(SEE INSTRUCTIONS)				
	11.7,00					

CUSII	P No. 398433102					
1	Names of reporting person					
	I.R.S. identification nos. of above persons (entities only)					
	GAMCO Asset Managem	ent Inc.	I.D. No. 13-4044521			
2	Check the appropriate box					
	11 1	<i>3</i> 1 ·				
			(b)			
3	3 Sec use only					
	J					
4	Source of funds (SEE INS					
	00-Funds of investment a	dvisory clients				
5	Check how if disclosure of	legal proceedings is requi	ired pursuant to items 2 (d) or 2 (e)			
3	Check box it disclosure of	regai proceedings is requi	rea parsuant to items 2 (a) or 2 (c)			
6	Citizenship or place of org	ganization				
	New York					
	Number Of	: 7	Sole voting power			
	Number of	:	out voting power			
	Shares	:	4,565,535 (Item 5)			
	Dan effetaller	<u>:</u>				
	Beneficially	: 8	Shared voting power			
	Owned	:	None			
		<u>:</u>				
	By Each	: 9	Sole dispositive power			
	Reporting	:	4 992 725 (Itom 5)			
	4 8	:	4,882,735 (Item 5)			
	Person	:10	Shared dispositive power			
	With	:				
	WILLI	:	None			
11	: Aggregate amount beneficially owned by each reporting person					
11	right chart amount of them to which by them reporting person					
	4,882,735 (Item 5)					
40						
12	Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)					
	(SEE INSTRUCTIONS)					
13	Percent of class represented by amount in row (11)					
	10.43%					
	10.40 /0					
14	Type of reporting person ((SEE INSTRUCTIONS)				
	IA, CO	,				

CUSII	P No. 398433102					
1	Names of reporting persons I.R.S. identification nos. of above persons (entities only)					
	Teton Advisors, Inc.		I.D. No. 13-4008049			
2	Check the appropriate box	Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (a)				
			(b)			
3	Sec use only					
4	Source of funds (SEE INST					
	00 – Funds of investment a	dvisory clients				
5	Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e)					
6	Citizenship or place of orga Delaware	Citizenship or place of organization Delaware				
	Number Of	: 7	Sole voting power			
	Shares	: :	486,703 (Item 5)			
	Beneficially	: 8	Shared voting power			
	Owned	: :	None			
	By Each	: 9	Sole dispositive power			
	Reporting	: :	486,703 (Item 5)			
	Person	:10	Shared dispositive power			
	With	: :	None			
11	Aggregate amount beneficially owned by each reporting person					
	486,703 (Item 5)					
12	Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)					
13	Percent of class represented	d by amount in row (11)			
	1.04%					
14	Type of reporting person (S	SEE INSTRUCTION	īs)			

	Names of reporting perso				
	I.R.S. identification nos. of GGCP, Inc.	of above persons (entities on	ly) I.D. No. 13-3056041		
2		x if a member of a group (S			
	11 1	3 1 (, , ,		
			4.		
			(b)		
3	Sec use only				
	0 11 1 (077 7)				
4	4 Source of funds (SEE INSTRUCTIONS) None				
	TONC				
5	Check box if disclosure of	legal proceedings is require	ed pursuant to items 2 (d) or 2 (e)		
6	Citizenship or place of or	ganization			
·	Wyoming	Summation			
	Number Of	: 7	Sole voting power		
		•			
	Shares	:	None		
		: : :	None		
	Shares Beneficially	: : : 8			
		: : : : 8 :	None Shared voting power		
	Beneficially Owned	: : : 8 : :	None		
	Beneficially	: : : : 8 : : : :	None Shared voting power		
	Beneficially Owned By Each	:	None Shared voting power None Sole dispositive power		
	Beneficially Owned By Each Reporting	:	None Shared voting power None		
	Beneficially Owned By Each	:	None Shared voting power None Sole dispositive power		
	Beneficially Owned By Each Reporting	: : : 9 :	None Shared voting power None Sole dispositive power None Shared dispositive power		
	Beneficially Owned By Each Reporting Person	: : : 9 :	None Shared voting power None Sole dispositive power None		
1	Beneficially Owned By Each Reporting Person With	: : : 9 :	None Shared voting power None Sole dispositive power None Shared dispositive power None		
1	Beneficially Owned By Each Reporting Person With	: : : 9 : : : :10 :	None Shared voting power None Sole dispositive power None Shared dispositive power None		

Percent of class represented by amount in row (11)

Type of reporting person (SEE INSTRUCTIONS) HC, CO

1	No. 398433102				
1	Names of reporting persons I.R.S. identification nos. of above persons (entities only)				
	GAMCO Investors, Inc. I.D. No. 13-4007862				
	Check the appropriate bo	ox if a member of a gro	up (SEE INSTRUCTIONS) (a)		
	(b)				
3	Sec use only	Sec use only			
4	Source of funds (SEE INS None	rce of funds (SEE INSTRUCTIONS) ne			
5	Check box if disclosure of	heck box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e)			
6	Citizenship or place of or Delaware	ganization			
6		ganization : 7	Sole voting power		
6	Delaware		Sole voting power None		
6	Delaware Number Of				
6	Delaware Number Of Shares	: 7 : :	None		
6	Delaware Number Of Shares Beneficially	: 7 : :	None Shared voting power		
6	Delaware Number Of Shares Beneficially Owned	: 7 : : : : 8 :	None Shared voting power None		
6	Number Of Shares Beneficially Owned By Each	: 7 : : : : 8 :	None Shared voting power None Sole dispositive power		

Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) X

Percent of class represented by amount in row (11)

Type of reporting person (SEE INSTRUCTIONS) HC, CO

12

13

14

0.00%

CUSIP No. 398433102 Names of reporting persons I.R.S. identification nos. of above persons (entities only) **Associated Capital Group, Inc.** I.D. No. 47-3965991 Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (a) (b) 3 Sec use only **Source of funds (SEE INSTRUCTIONS)** 4 \mathbf{WC} Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) 5 Citizenship or place of organization Delaware Number Of : 7 Sole voting power : Shares : 5,019 (Item 5) Beneficially : 8 **Shared voting power** : Owned : None : : 9 By Each Sole dispositive power : Reporting : 5,019 (Item 5) Person :10 Shared dispositive power : With None 11 Aggregate amount beneficially owned by each reporting person

7

5,019 (Item 5)

0.01%

HC, CO

12

13

14

(SEE INSTRUCTIONS) X

Check box if the aggregate amount in row (11) excludes certain shares

Percent of class represented by amount in row (11)

Type of reporting person (SEE INSTRUCTIONS)

CUSIP 1	No. 398433102 Names of reporting person I.R.S. identification nos. o		only)			
	Mario J. Gabelli	P	- 3,			
2	Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (a) (a)					
			(b)			
3	Sec use only	ec use only				
4	Source of funds (SEE INSTRUCTIONS) None					
5	Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e)					
6	Citizenship or place of organization USA					
	Number Of	: 7	Sole voting power			
	Shares	: : :	None (Item 5)			
	Beneficially	: 8	Shared voting power			
Owned : None		None				
	By Each	: 9	Sole dispositive power			
	Reporting : None (Item 5)					
	Person	:10	Shared dispositive power			
	With	: : :	None			
11	Aggregate amount benefic	cially owned by each repo	orting person			
	None (Item 5)					
12	Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) X					

13

14

0.00%

Percent of class represented by amount in row (11)

Type of reporting person (SEE INSTRUCTIONS) IN

Item 1. Security and Issuer

This Amendment No. 21 to Schedule 13D on the Common Stock of Griffon Corporation (the "Issuer") is being filed on behalf of the undersigned to amend the Schedule 13D, as amended (the "Schedule 13D"), which was originally filed on February 19, 2008. Unless otherwise indicated, all capitalized terms used herein but not defined herein shall have the same meaning as set forth in the Schedule 13D.

Item 2. <u>Identity and Background</u>

Item 2 to Schedule 13D is amended, in pertinent part, as follows:

This statement is being filed by Mario J. Gabelli ("Mario Gabelli") and various entities which he directly or indirectly controls or for which he acts as chief investment officer. These entities, except for LICT Corporation ("LICT) and CIBL, Inc. ("CIBL"), engage in various aspects of the securities business, primarily as investment adviser to various institutional and individual clients, including registered investment companies and pension plans, and as general partner or the equivalent of various private investment partnerships or private funds and as a registered broker-dealer. Certain of these entities may also make investments for their own accounts.

The foregoing persons in the aggregate often own beneficially more than 5% of a class of equity securities of a particular issuer. Although several of the foregoing persons are treated as institutional investors for purposes of reporting their beneficial ownership on the short-form Schedule 13G, the holdings of those who do not qualify as institutional investors may exceed the 1% threshold presented for filing on Schedule 13G or implementation of their investment philosophy may from time to time require action which could be viewed as not completely passive. In order to avoid any question as to whether their beneficial ownership is being reported on the proper form and in order to provide greater investment flexibility and administrative uniformity, these persons have decided to file their beneficial ownership reports on the more detailed Schedule 13D form rather than on the short-form Schedule 13G and thereby to provide more expansive disclosure than may be necessary.

(a), (b) and (c) - This statement is being filed by one or more of the following persons: GGCP, Inc. ("GGCP"), GGCP Holdings LLC ("GGCP Holdings"), GAMCO Investors, Inc. ("GBL"), Associated Capital Group, Inc. ("AC"), Gabelli Funds, LLC ("Gabelli Funds"), GAMCO Asset Management Inc. ("GAMCO"), Teton Advisors, Inc. ("Teton Advisors"), Gabelli & Company Investment Advisers, Inc. ("GCIA"), Morgan Group Holding Co., ("MGH"), G.research, LLC ("G.research"), MJG Associates, Inc. ("MJG Associates"), Gabelli Foundation, Inc. ("Foundation"), Mario Gabelli, LICT and CIBL. Those of the foregoing persons signing this Schedule 13D are hereinafter referred to as the "Reporting Persons".

GGCP makes investments for its own account and is the manager and a member of GGCP Holdings which is the controlling shareholder of GBL and AC. GBL, a public company listed on the New York Stock Exchange, is the parent company for a variety of companies engaged in the securities business, including certain of those named below. AC, a public company listed on the New York Stock Exchange, is the parent company for a variety of companies engaged in the securities business, including certain of those listed below.

GAMCO, a wholly-owned subsidiary of GBL, is an investment adviser registered under the Investment Advisers Act of 1940, as amended ("Advisers Act"). GAMCO is an investment manager providing discretionary managed account services for employee benefit plans, private investors, endowments, foundations and others.

GCIA, a wholly owned subsidiary of AC, is an investment adviser registered under the Advisers Act and serves as a general partner or investment manager to limited partnerships and offshore investment companies and other accounts. As a part of its business, GCIA may purchase or sell securities for its own account. GCIA is a general partner or investment manager of a number of funds or partnerships, including Gabelli Associates Fund, L.P., Gabelli Associates Fund II, L.P., Gabelli Associates Limited, Gabelli Associates Limited, Gabelli Associates Limited, Gabelli Intermediate Credit Fund L.P., GAMA Select Energy + L.P., GAMCO Medical Opportunities L.P., and Gabelli Multimedia Partners, L.P.

G.research is a wholly owned subsidiary of MGH. MGH in turn is controlled by AC through an 83% ownership interest. G.research, is a broker-dealer registered under the Securities Exchange Act of 1934, as amended ("1934 Act"), which as a part of its business regularly purchases and sells securities for its own account.

Gabelli Funds, a wholly owned subsidiary of GBL, is a limited liability company. Gabelli Funds is an investment adviser registered under the Advisers Act which provides advisory services for The Gabelli Equity Trust Inc., The Gabelli Asset Fund, The GAMCO Growth Fund, The Gabelli Convertible and Income Securities Fund Inc., The Gabelli Value 25 Fund Inc., The Gabelli Small Cap Growth Fund, The Gabelli Equity Income Fund, The Gabelli ABC Fund, The GAMCO Global Content & Connectivity Fund, The Gabelli Gold Fund, Inc., The Gabelli Multimedia Trust Inc., The Gabelli Global Rising Income & Dividend Fund, The Gabelli Capital Asset Fund, The GAMCO International Growth Fund, Inc., The GAMCO Global Growth Fund, The Gabelli Utility Trust, The Gabelli Utilities Fund, The Gabelli Dividend Growth Fund, The Gabelli Focus Five Fund, The Comstock Capital Value Fund, The Gabelli Dividend and Income Trust, The Gabelli Global Utility & Income Trust, The GAMCO Global Gold, Natural Resources, & Income Trust, The GAMCO Natural Resources Gold & Income Trust, The GDL Fund, Gabelli Enterprise Mergers & Acquisitions Fund, The Gabelli ESG Fund, Inc., The Gabelli International Small Cap Fund, The Gabelli Healthcare & Wellness Rx Trust, The Gabelli Global Small and Mid Cap Value Trust, Gabelli Value Plus+ Trust, Gabelli Merger Plus+ Trust Plc, The Gabelli Global Financial Services Fund, The Gabelli Global Mini Mites Fund, The Gabelli Go Anywhere Trust, The Gabelli Media Mogul Fund, The Gabelli Pet Parents' Fund, The Gabelli U.S. Treasury Money Market Fund, Bancroft Fund Ltd. and Ellsworth Growth & Income Fund Ltd. (collectively, the "Funds"), which are registered investment companies. Gabelli Funds is also the investment adviser to The GAMCO International SICAV (sub-funds GAMCO Merger Arbitrage and GAMCO All Cap Value), a UCITS III vehicle.

Teton Advisors, an investment adviser registered under the Advisers Act, provides discretionary advisory services to The TETON Westwood Mighty Mitessm Fund, The TETON Westwood Income Fund, The TETON Westwood SmallCap Equity Fund, TETON Westwood Intermediate Bond Fund, and The TETON Westwood Mid-Cap Equity Fund.

MJG Associates provides advisory services to private investment partnerships and offshore funds. Mario Gabelli is the sole shareholder, director and employee of MJG Associates. MJG Associates is the Investment Manager of Gabelli International Limited and Gabelli Fund, LDC. Mario J. Gabelli is the general partner of Gabelli Performance Partnership, LP.

The Foundation is a private foundation. Mario Gabelli is the Chairman, a Trustee and the Investment Manager of the Foundation. Elisa M. Wilson is the President of the Foundation.

LICT is a holding company with operating subsidiaries engaged primarily in the rural telephone industry. LICT actively pursues new business ventures and acquisitions. LICT makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, or trading in securities. Mario J. Gabelli is the Chief Executive Officer, a director, and substantial shareholder of LICT.

CIBL is a holding company with interests in telecommunications operations, primarily in the rural telephone industry. CIBL actively pursues new business ventures and acquisitions. CIBL makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, or trading in securities. Mario J. Gabelli is a director, and substantial shareholder of CIBL.

Mario Gabelli is the controlling stockholder, Chief Executive Officer and a director of GGCP and Chairman and Chief Executive Officer of GBL. He is the Executive Chairman of AC. Mario Gabelli is also a member of GGCP Holdings. Mario Gabelli is the controlling shareholder of Teton.

The Reporting Persons do not admit that they constitute a group.

GAMCO is a New York corporation and GBL, MGH and Teton Advisors are Delaware corporations, each having its principal business office at One Corporate Center, Rye, New York 10580. GGCP is a Wyoming corporation and AC and GCIA are Delaware corporations each having its principal business office 191 Mason Street, Greenwich, CT 06830. GGCP Holdings is a Delaware limited liability corporation having its principal business office at 191 Mason Street, Greenwich, CT 06830. G.research is a Delaware limited liability company having its principal officers at One Corporate Center, Rye, New York 10580. Gabelli Funds is a New York limited liability company having its principal business office at One Corporate Center, Rye, New York 10580. MJG Associates is a Connecticut corporation having its principal business office at 191 Mason Street, Greenwich, CT 06830. The Foundation is a Nevada corporation having its principal offices at 165 West Liberty Street, Reno, Nevada 89501. LICT is a Delaware corporation having its principal place of business as 401 Theodore Fremd Avenue, Rye, New York 10580. CIBL, Inc. is a Delaware corporation having its principal place of business as 165 West Liberty Street, Suite 220, Reno, NV 89501.

For information required by instruction C to Schedule 13D with respect to the executive officers and directors of the foregoing entities and other related persons (collectively, "Covered Persons"), reference is made to Schedule I annexed hereto and incorporated herein by reference.

- (d) Not applicable.
- (e) Not applicable.
- (f) Reference is made to Schedule I hereto.

Item 5. <u>Interest In Securities Of The Issuer</u>

Item 5 to Schedule 13D is amended, in pertinent part, as follows:

(a) The aggregate number of Securities to which this Schedule 13D relates is 7,348,457 shares, representing 15.70% of the approximately 46,800,571 shares outstanding as reported in the Issuer's most recent 10-Q for the quarterly period ended June 30, 2019. The Reporting Persons beneficially own those Securities as follows:

Name	Shares of Common Stock	% of Class of Common
Gabelli Funds	1,974,000	4.22%
GAMCO	4,882,735	10.43%
Teton Advisors	486,703	1.04%
AC	5.019	0.01%

Mario Gabelli is deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons. GCIA is deemed to have beneficial ownership of the Securities owned beneficially by G.research, AC, GBL and GGCP are deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons other than Mario Gabelli and the Foundation.

- (b) Each of the Reporting Persons and Covered Persons has the sole power to vote or direct the vote and sole power to dispose or to direct the disposition of the Securities reported for it, either for its own benefit or for the benefit of its investment clients or its partners, as the case may be, except that (i) GAMCO does not have the authority to vote 317,200 of its reported shares, (ii) Gabelli Funds has sole dispositive and voting power with respect to the shares of the Issuer held by the Funds so long as the aggregate voting interest of all joint filers does not exceed 25% of their total voting interest in the Issuer and, in that event, the Proxy Voting Committee of each Fund shall respectively vote that Fund's shares, (iii) at any time, the Proxy Voting Committee of each such Fund may take and exercise in its sole discretion the entire voting power with respect to the shares held by such fund under special circumstances such as regulatory considerations, and (iv) the power of Mario Gabelli, AC, GBL, and GGCP is indirect with respect to Securities beneficially owned directly by other Reporting Persons.
- (c) Information with respect to all transactions in the Securities which were effected during the past sixty days or since the most recent filing on Schedule 13D, whichever is less, by each of the Reporting Persons and Covered Persons is set forth on Schedule II annexed hereto and incorporated herein by reference.
 - (e) Not applicable.

Signature

After reasonable inquiry and to the best of my knowledge and belief, I certify that the information set forth in this statement is true, complete and correct.

Dated: November 15, 2019

GGCP, INC. MARIO J. GABELLI

By:/s/ David Goldman

David Goldman Attorney-in-Fact

TETON ADVISORS, INC. GABELLI FUNDS, LLC

By:/s/ David Goldman

David Goldman General Counsel – Gabelli Funds, LLC Counsel-Teton Advisors, Inc.

GAMCO INVESTORS, INC.

By:/s/ Kevin Handwerker

Kevin Handwerker

 $General\ Counsel\ \&\ Secretary-GAMCO\ Investors,\ Inc.$

ASSOCIATED CAPITAL GROUP, INC. GAMCO ASSET MANAGEMENT INC.

By:/s/ Douglas R. Jamieson

Douglas R. Jamieson

President & Chief Executive Officer – Associated Capital Group, Inc.

President – GAMCO Asset Management Inc.

President – Gabelli & Company Investment Advisers, Inc.

Schedule I Information with Respect to Executive Officers and Directors of the Undersigned Schedule I to Schedule 13D is amended, in pertinent part, as follows:

The following sets forth as to each of the executive officers and directors of the undersigned: his name; his business address; his present principal occupation or employment and the name, principal business and address of any corporation or other organization in which such employment is conducted. Unless otherwise specified, the principal employer of each such individual is GAMCO Asset Management Inc., Gabelli Funds, LLC, Gabelli & Company Investment Advisers, Inc., G.research, LLC, Teton Advisors, Inc., Associated Capital Group, Inc. or GAMCO Investors, Inc., the business address of each of which is One Corporate Center, Rye, New York 10580, and each such individual identified below is a citizen of the United States. To the knowledge of the undersigned, during the last five years, no such person has been convicted in a criminal proceeding (excluding traffic violations or similar misdemeanors), and no such person was a party to a civil proceeding of a judicial or administrative body of competent jurisdiction as a result of which he was or is subject to a judgment, decree or final order enjoining future violations of, or prohibiting or mandating activities subject to, federal or state securities law or finding any violation with respect to such laws except as reported in Item 2(d) and (e) of this Schedule 13D.

GAMCO Investors, Inc.

Directors:

Edwin L. Artzt Former Chairman and Chief Executive Officer

Procter & Gamble Company 900 Adams Crossing Cincinnati, OH 45202

Raymond C. Avansino Chairman & Chief Executive Officer

E.L. Wiegand Foundation 165 West Liberty Street Reno, NV 89501

Leslie B. Daniels Operating Partner

AE Industrial Partners, LP 2500 N. Military Trail, Suite 470

Boca Raton, FL 33431

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer of GGCP, Inc.

Chairman & Chief Executive Officer of GAMCO Investors, Inc.

Executive Chairman of Associated Capital Group, Inc.

Director/Trustee of all registered investment companies advised by Gabelli Funds, LLC.

Director

c/o GAMCO Investors, Inc. Elisa M. Wilson One Corporate Center

One Corporate Center Rye, NY 10580

Eugene R. McGrath Former Chairman and Chief Executive Officer

Consolidated Edison, Inc.

4 Irving Place

New York, NY 10003

Robert S. Prather President & Chief Executive Officer

Heartland Media, LLC 1843 West Wesley Road Atlanta, GA 30327

Officers:

Mario J. Gabelli Chairman and Chief Executive Officer

Henry G. Van der Eb Senior Vice President

Bruce N. Alpert Senior Vice President

Agnes Mullady Senior Vice President

Kevin Handwerker Executive Vice President, General Counsel and Secretary

Kieran Caterina Chief Accounting Officer

GAMCO Asset Management Inc.

Directors:

Douglas R. Jamieson Regina M. Pitaro William S. Selby

Officers:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer – Value Portfolios

Douglas R. Jamieson President, Chief Operating Officer and Managing Director

David Goldman General Counsel, Secretary & Chief Compliance Officer

Gabelli Funds, LLC

Chief Investment Officer – Value Portfolios
Executive Vice President and Chief Operating Officer
President and Chief Operating Officer – Open End Fund Division
General Counsel
Chairman, Trustee & Chief Investment Officer
President
Trustee
Trustee
Trustee

GGCP, Inc.

Di	rec	to:	rs.

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer of GGCP, Inc.

Chairman & Chief Executive Officer of GAMCO Investors, Inc.

Executive Chairman of Associated Capital Group, Inc.

Director/Trustee of all registered investment companies advised by Gabelli Funds, LLC.

Marc Gabelli President – GGCP, Inc.

Matthew R. Gabelli Vice President – Trading

G.research, LLC One Corporate Center Rye, NY 10580

Michael Gabelli President & COO

Gabelli & Partners, LLC One Corporate Center Rye, NY 10580

Frederic V. Salerno Chairman

Former Vice Chairman and Chief Financial Officer

Verizon Communications

Vincent S. Tese Executive Chairman – FCB Financial Corp

Elisa M. Wilson Director

Officers:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer

Marc Gabelli President

Francis J. Conroy Special Assistant to CEO, Secretary

Silvio A. Berni Chief Financial and Accounting Officer, Vice President Corporate Development and Controller,

Assistant Secretary

GGCP Holdings LLC

Members:

GGCP, Inc. Manager and Member

Mario J. Gabelli Member

Teton Advisors, Inc.

Directors:

Marc Gabelli Executive Chairman

Vincent J. Amabile Founder- Amabile Partners

Stephen G. Bondi, CPA Chief Financial Officer – Mittleman Brothers, LLC

Aaron J. Feingold, M.D. President and Founder – Raritan Bay Cardiology Group

Nicholas F. Galluccio Chief Executive Officer and President

Kevin M. Keeley President & Executive Chairman – Keeley Teton Advisors, LLC

John M. Tesoro, CPA Retired Partner – KPMG LLP

Officers:

Nicholas F. Galluccio See above

Patrick B. Huvane, CPA, CFA Chief Financial Officer

Deanna B. Marotz Chief Compliance Officer

Associated Capital Group, Inc.

Directors:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer of GGCP, Inc.

Chairman & Chief Executive Officer of GAMCO Investors, Inc.

Executive Chairman of Associated Capital Group, Inc.

Director/Trustee of all registered investment companies advised by Gabelli Funds, LLC.

Marc Gabelli President – GGCP, Inc.

Douglas R. Jamieson President and Chief Executive Officer

Bruce Lisman - JP Morgan - Global Equity Division

Daniel R. Lee Chief Executive Officer

Full House Resorts, Inc.

4670 South Ford Apache Road, Suite 190

Las Vegas, NV 89147

Salvatore F. Sodano Vice Chairman – Broadridge Financial Solutions

Frederic V. Salerno See above

Elisa M. Wilson Director

Officers:

Mario J. Gabelli Executive Chairman

Douglas R. Jamieson President and Chief Executive Officer

Kenneth D. Masiello Chief Accounting Officer

Kevin Handwerker Executive Vice President, General Counsel and Secretary

David Fitzgerald Assistant Secretary

Gabelli & Company Investment Advisers, Inc.

Directors:

Douglas R. Jamieson

Officers:

Douglas R. Jamieson Chief Executive Officer and President

John Givissis Controller

Kevin Handwerker Secretary

David Fitzgerald Assistant Secretary

G.research, LLC

Officers:

Cornelius V. McGinity Office of the Chairman

Vincent Amabile President

Bruce N. Alpert Vice President

Douglas R. Jamieson Secretary

Kevin Handwerker Assistant Secretary

David Fitzgerald Assistant Secretary

David Goldman Assistant Secretary

Josephine D. LaFauci Chief Compliance Officer

SCHEDULE II

INFORMATION WITH RESPECT TO

TRANSACTIONS EFFECTED DURING THE PAST SIXTY DAYS OR SINCE THE MOST RECENT FILING ON SCHEDULE 13D (1)

SHARES PURCHASED AVERAGE

DATE SOLD(-) PRICE(2)

COMMON STOCK-GRIFFON CORPORATION

GABELLI & COMPANY INVESTMENT ADVISERS, INC.

		ESTMENT ADVISERS, INC
10/07/19	2,000-	20.4864
GAMCO ASSET M		
11/14/19	4,800-	24.8665
11/12/19	1,600-	21.7056
11/11/19	4,500-	21.4514
11/08/19	700-	21.3000
11/07/19	-008	21.2100
11/05/19	5,000-	21.2365
11/04/19	500-	21.8400
11/01/19	200-	21.5619
11/01/19	600-	21.6400
10/31/19	2,400-	*DO
10/31/19	-008	*DO
10/31/19	126-	*DO
10/29/19	300-	21.0700
10/28/19	500-	21.0200
10/24/19	2,000-	20.5198
10/23/19	2,000-	20.7250
10/22/19	100-	20.6938
10/21/19	200-	20.9038
10/17/19	500-	20.9425
10/17/19	100-	20.7900
10/16/19	1,000	*DI
10/14/19	1,000-	*DO
10/11/19	333-	*DO
10/09/19	8,000-	20.0204
10/09/19	4,000-	20.0263
10/08/19	2,113-	20.1933
10/04/19	500-	20.5403
10/03/19	1,220	*DI
10/02/19	500-	20.7320
10/01/19	1,505-	*DO
10/01/19	2,134-	21.1689
9/30/19	4,000-	21.2593
9/30/19	4,000-	21.2592
9/30/19	4,000	21.2592
9/30/19	1,050-	*DO
9/30/19	1,050-	*DO
9/30/19	4,500-	21.1122
9/30/19	1,050-	*DO
9/30/19	2,100	*DI
9/27/19	4,000-	20.3669
9/26/19	22,000-	20.4898
9/24/19	200-	20.3500
9/24/19	2,000-	20.2889
9/23/19	1,000-	20.2841
9/20/19	4,000-	20.7290
9/19/19	2,100-	20.9173
9/18/19	500-	21.4500
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1,000-
      9/18/19
                              21.2826
                   3,000-
      9/18/19
                              21.3086
      9/17/19
                   5,600-
                              21.1336
      9/17/19
                   2,000-
                              21.2020
      9/16/19
                   4,400-
                              21.0582
      9/16/19
                  75,000-
                               *DO
TETON ADVISORS, INC
     11/06/19
                   7,000-
                              21.0376
     11/04/19
                   8,000-
                              21.3927
                               21.5547
                   22,228-
     11/01/19
     11/01/19
                   11,114
                               21.5547
     10/08/19
                   3,762-
                              20.3452
GABELLI FUNDS, LLC.
  GABELLI VALUE PLUS+ TRUST
                  43,000-
                               24.7739
     11/14/19
     11/13/19
                   4,000-
                              21.9413
                              21.7300
     11/12/19
                   4,400-
                   8,600-
                              21.3042
     11/07/19
      9/19/19
                   9,000-
                              21.4218
                   1,000-
      9/18/19
                              21.3500
  GABELLI SMALL CAP GROWTH FUND
                   14,147-
                               21.2403
     11/05/19
     10/28/19
                     853-
                              21.1238
     10/21/19
                    1.400-
                               21.0332
  GABELLI GLOBAL SMALL AND MIDCAP VALUE TRUST
  9/16/19
                  3,000-
                             21.0500
  GABELLI GO ANYWHERE TRUST
      9/16/19
                   1,400-
                              21.0502
  GABELLI EQUITY TRUST
     10/01/19
                   14,000-
                               21.1064
     10/01/19
                   7,000
                              21.1064
  GABELLI DIVIDEND & INCOME TRUST
                              21.3086
      9/18/19
                   1,500-
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- (1) UNLESS OTHERWISE INDICATED, ALL TRANSACTIONS WERE EFFECTED ON THE NYSE.
- (2) PRICE EXCLUDES COMMISSION.
- (*) RESULTS IN CHANGE OF DISPOSITIVE POWER AND BENEFICIAL OWNERSHIP.