



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
INVESTMENT MANAGEMENT

October 1, 2015

VIA ELECTRONIC MAIL

Mr. Leon E. Salkin, Esq.
Morgan, Lewis & Bockius, LLP
1701 Market Street
Philadelphia, PA 19103-2921

Re.: Gallery Trust (the "Registrant"); File Nos.: 333-206713 / 811-23091; Mondrian International Equity Fund (the "Fund")

Dear Mr. Salkin:

The staff has reviewed the registration statement referred to above, which the Commission received on September 1, 2015. We gave the filing a full review. Item references are to the item numbers set forth in Form N-1A.

I. Prospectus Comments

A. Item 3

1. In the introduction to the example, please state that the example assumes that the investor either redeems or retains the shares at the end of the period.
2. In the paragraph on Portfolio Turnover, add disclosure indicating that no portfolio turnover rate is included because the Fund is new.

B. Items 4 and 9

1. The Principal Investment Strategies section states that, to the extent the Fund may invest in convertible securities, if those convertible securities are rated, the rating will not be an important factor in its the Fund's investment decision. Please explain supplementally to the staff why this is the case with respect to ratings. Furthermore, consider adding disclosure regarding the rationale for this investment policy.
2. As noted above, the Fund may invest in convertible securities. If the fund invests or expects to invest in contingent convertible securities ("CoCos"), the Fund should consider what, if any, disclosure is appropriate. The type and location of disclosure will depend on, among other things, the extent to which the Fund invests in CoCos, and the

characteristics of the CoCos, (e.g., the credit quality, the conversion triggers). If CoCos are or will be a principal type of investment, the Fund should provide a description of them and should provide appropriate risk disclosure, including the amount the Fund might invest in such securities.

3. In light of the Fund's statement on page 5, that it "may make limited use of foreign fixed income securities," the staff questions whether such investments should be considered a principal strategy. Please supplementally explain this, or revise your Items 4 and 9 disclosure, as appropriate.

4. Include Foreign Government Agencies Risk as a principal risk only if foreign fixed income investments are disclosed as a principal strategy.

5. Include Corporate Fixed Income Securities Risk as a principal risk only if foreign fixed income investments are disclosed as a principal strategy.

6. If the Fund expects to have a portfolio turnover rate of 100% or more, please add appropriate risk disclosure, e.g., transaction costs, taxable distributions.

7. Disclosure states that the Fund's policy of 80% investment in equity securities will not be changed prior to 60 days' prior notice to shareholders. Since the word "International" is used in the Fund's name, please confirm to the staff that 60 days prior notice to shareholders would also be provided before changing the Fund's name or its investment policy regarding non U.S. companies.

8. Please revise the sections captioned, "More Information about the Fund's Investment Objectives and Strategies," and "More Information About Risk," as required by Item 9. Disclosure in response to Items 4 and 9 cannot be substantially the same. See IM Guidance Update 2014-08.

C. Investment Adviser:

1. Consider moving the disclosure on page 13 in the paragraph that begins, "[f]rom time to time," to the section where risk disclosure is set forth.

2. In the next paragraph beginning with, "if permitted under applicable law," please discuss the law applicable to the Adviser reducing the shareholder's investment advisory fees.

D. Related Performance Data of the Adviser -- Performance Information for the Adviser's Other International Equity Accounts

1. Since the Fund is presenting adjusted performance, the Fund should represent supplementally that the use of adjusted fees and expenses does not result in performance that is higher than what would have been achieved using the actual fees and expenses.

2. At the end of the first paragraph in this section, prior to the parenthetical that states, “as set forth in the Annual Fund Operating Expenses table . . .,” please add, “including maximum sales loads.”
3. Please add to the narrative disclosure how the performance was calculated. For clarity and to the extent applicable, consider adding an explanation similar to that used in footnote 1 of this section, regarding the modified Dietz method.
4. We note that the composite performance information is calculated in and expressed in U.S. dollars. Please clarify to the staff whether the accounts included in this performance were denominated in a different currency. If so, the Fund should explain what currency the accounts were denominated in and explain that performance would have been different because of currency conversions.
5. The heading on page 15 should read “*Prior Performance Information for the Adviser’s Other International Equity Accounts.*”
6. Please represent supplementally that the Fund has the records necessary to support the calculation of the performance as required by rule 204-2(a)(16) under the Investment Advisers Act.

E. Involuntary Redemptions of Your Shares

Please disclose the circumstances under which you would involuntarily redeem shares when the account balance drops below \$1 million.

II. SAI Comments

A. Investment Limitations – Fundamental Policies

Please revise the disclosure in item 2 on page S-31 so that it is clear that this exclusion does not eliminate the requirement for tax-exempt bond funds to disclose their policy with respect to concentration.

B. Underwriting

In the first sentence of the second paragraph in this section, on page S-33, insert the words, “and illiquid securities,” after the words, “the Fund’s policy concerning borrowing.”

C. Portfolio Holdings

In this section, identify by name all third parties who receive portfolio holdings information in advance pursuant to an ongoing arrangement.

III. General Comment and Representation of the Registrant

A. The staff may have additional comments on incomplete portions of the filing when you complete them in pre-effective amendments, on disclosures made in response to this letter, on information you supply to us, or on exhibits added in any pre-effective amendments.

B. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings reviewed by the staff to be certain that they have provided all information investors require for an informed decision. Since the Registrant and its management are in possession of all facts relating to the Registrant's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

Notwithstanding our comments, in the event a Registrant requests acceleration of the effective date of a pending registration statement, it should furnish a letter, at the time of such request, acknowledging that

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the Registrant is responsible for the adequacy and accuracy of the disclosure in the filing; the staff's comments, the Registrant's changes to the disclosure in response to the staff's comments or the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve Registrant from this responsibility; and
- the Registrant may not assert this action or the staff's comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Investment Management in connection with our review of your filings or in response to our comments on your filings. We will consider a written request for acceleration of the effective date of a registration statement as a confirmation of the fact that those requesting acceleration are aware of their respective responsibilities.

Responses to these comments should be made in a letter to me filed on EDGAR and in a pre-effective amendment to the registration statement. If you believe that you do not need to change the registration statement in response to a comment, please indicate that in the letter and explain your position.

Although we have completed our initial review of the registration statement, it will be reviewed further after we receive your response to our comments. Therefore, we reserve the right to comment further on the registration statement and any amendments to it. After we have

resolved all issues, the Registrant and its underwriter must both request that the effective date of the registration statement be accelerated.

If you have any questions, you are welcome to call me at (202) 551-6763. My e-mail address is scottpa@sec.gov, and documents can be faxed to me at (202) 772-9285. Mail or deliveries should include reference to zip code 20549-8633.

Sincerely,

/s/ Patrick Scott

Patrick Scott
Senior Counsel
Office of Disclosure and Review