

UNITED STATES OF AMERICA
BEFORE THE
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT COMPANY ACT OF 1940
Release No. 28483 / November 4, 2008

In the Matter of :
 :
CALAMOS CONVERTIBLE OPPORTUNITIES AND INCOME FUND :
CALAMOS CONVERTIBLE AND HIGH INCOME FUND :
CALAMOS STRATEGIC TOTAL RETURN FUND :
CALAMOS GLOBAL TOTAL RETURN FUND :
CALAMOS GLOBAL DYNAMIC INCOME FUND :
and CALAMOS ADVISORS LLC :
2020 Calamos Court :
Naperville, IL 60563 :
 :
(812-13063) :

ORDER UNDER SECTION 6(c) OF THE INVESTMENT COMPANY ACT OF 1940
("Act") GRANTING AN EXEMPTION FROM SECTION 19(b) OF THE ACT AND
RULE 19b-1 UNDER THE ACT

Calamos Convertible Opportunities and Income Fund, Calamos Convertible and High Income Fund, Calamos Strategic Total Return Fund, Calamos Global Total Return Fund and Calamos Global Dynamic Income Fund (collectively, the "Funds") and Calamos Advisors LLC (the "Adviser") filed an application on January 27, 2004, which was amended on March 16, 2007 and July 24, 2008. Applicants requested an order under section 6(c) of the Act granting an exemption from section 19(b) of the Act and rule 19b-1 under the Act to conditionally permit the Funds to make periodic distributions of long-term capital gains with respect to the Funds' outstanding common stock as frequently as twelve times each year and as frequently as distributions are specified in the terms of any outstanding preferred stock.

On October 7, 2008, a notice of the filing of the application was issued (Investment Company Act Release No. 28435). The notice gave interested persons an opportunity to request a hearing and stated that an order granting the application would be issued unless a hearing was ordered. No request for a hearing has been filed and the Commission has not ordered a hearing.

The matter has been considered and it is found, on the basis of the information set forth in the application, as amended, that granting the requested relief is appropriate in

the public interest and consistent with the protection of investors and the purposes fairly intended by the policy and provisions of the Act.

Accordingly, in the matter of Calamos Convertible Opportunities and Income Fund, et al. (File No. 812-13063),

IT IS ORDERED, under section 6(c) of the Act, that the requested exemption from section 19(b) of the Act and rule 19b-1 under the Act, is granted, effective immediately, subject to the conditions contained in the application, as amended.

For the Commission, by the Division of Investment Management, under delegated authority.

Florence E. Harmon
Acting Secretary