

February 26, 2009

Ms. Elizabeth Murphy
Secretary
United States Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-1090

FEB 27 2009

Re: Application of AdvisorShares Investments, LLC and AdvisorShares Trust, Investment Company Act Release No. 28568; 812-13488 (December 23, 2008) (the "Application")

Dear Ms. Murphy:

We are writing on behalf of Arrow Investment Advisors, LLC ("Arrow") in response to the comments submitted by John McGuire of Morgan Lewis & Bockius LLP on January 27, 2009 (the "Comment") as counsel to AdvisorShares Investments, LLC and AdvisorShares Trust (together, "AdvisorShares" or the "Applicant"), in response to Arrow's Request for Hearing submitted on January 13, 2009 (the "Request for Hearing"). Not having been provided with a copy of the Comment by the Applicant or Applicant's counsel, Arrow only learned this week of the Comment and is now promptly providing this response thereto.

Despite the vague wording of the Comment, the Applicant appears to dispute the facts set forth in Arrow's Request for Hearing. Tellingly, however, the Applicant failed to identify any specific statement in the Request for Hearing that is untrue or misleading in any respect. As discussed in the Request for Hearing, the Applicant's ownership of the business lines and assets that are the subject of the Application is in serious question and is the subject of an on-going arbitration process. These facts are beyond dispute.

Contrary to the assertions in the Comment, Arrow's Request for Hearing is not based on issues of competition. In view of the large players dominating the Exchange-Traded Fund ("ETF") market, AdvisorShares' entry into the ETF market place can have no meaningful effect on competition in that market. Rather, Arrow maintains that it is in the best interest of investors for Commission staff (the "Staff") to await the outcome of the arbitration prior to taking action on the Application because the Applicant's right to ownership of its ETF business lines and assets, including the ETF business line that is the subject of the Application, is uncertain. If the recently constituted arbitration tribunal determines that the Applicant does not own the AdvisorShares business lines and assets, action may be taken with respect to the AdvisorShares funds, including a transfer of ownership of the funds' advisor, and/or restructuring or dissolution of the funds, which would adversely impact fund investors.

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As a result of the above, we request a hearing on the Application. At a minimum, we request that, to protect fund investors, the Staff await the outcome of the arbitration before taking action on the Application. If the Application is granted and corresponding funds are launched, we believe that the Applicant should be required to prominently disclose the risk associated with the on-going arbitration to potential fund shareholders.

Thank you for your consideration of this further submission. Please do not hesitate to contact me should you have any questions regarding the above.

Very best regards,



Nicole Marie Crum

NMC/ceb

cc: Courtney S. Thornton, Senior Counsel, SEC, Division of Investment Management
Michael W. Mundt, Assistant Director, SEC, Division of Investment Management