

ITEM 1

COVER PAGE

GUGGENHEIM

GUGGENHEIM FUND SOLUTIONS, LLC

PART 2A OF FORM ADV: FIRM BROCHURE

This brochure provides information about the qualifications and business practices of Guggenheim Fund Solutions, LLC, a Delaware limited liability company ("Guggenheim Fund Solutions" or "GFS"). If you have any questions about the contents of this brochure, please contact us at (212) 377-3770. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority. Guggenheim Fund Solutions is registered as an investment adviser with the SEC. Registration does not imply a certain level of skill or training.

Additional information about Guggenheim Fund Solutions is also available on the SEC's website at www.adviserinfo.sec.gov.

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August 28, 2014

ITEM 2

MATERIAL CHANGES

Guggenheim Fund Solutions is required to identify and discuss any material changes made to this Form ADV Part 2A (this "Brochure") since its last annual update submitted on February 19, 2014. There have been no material changes from the last annual update.

You may request the most recent version of our Brochure by contacting Patrick J. McMahon, Guggenheim Funds Solutions' Chief Compliance Officer, at patrick.mcmahon@guggenheimpartners.com or (212) 607-2559.

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ITEM 4

ADVISORY BUSINESS

A. General Description of Advisory Firm

Guggenheim Fund Solutions, LLC (“Guggenheim Fund Solutions” or GFS”) was organized on October 3, 2011. GFS has been registered as an investment adviser with the SEC since February 2, 2012 and began managing assets on July 1, 2012.

Guggenheim Fund Solutions is a wholly-owned subsidiary of GPFT Holdco, LLC, which is wholly owned by GP Holdco, LLC. GP Holdco, LLC is wholly owned by Guggenheim Partners, LLC. Guggenheim Partners, LLC is a wholly-owned subsidiary of Guggenheim Capital, LLC. Guggenheim Capital, LLC is owned in part by Sage Assets, Inc. Sage Assets, Inc. is wholly-owned by Sammons Equity Alliance, Inc. Sammons Equity Alliance, Inc. is wholly owned by Consolidated Investment Services, Inc., which is wholly-owned by Sammons Enterprises, Inc., which is owned by Sammons Enterprises, Inc. Employee Stock Ownership Trust. Greatbanc Trust Company is a Trustee to Sammons Enterprises, Inc. Employee Stock Ownership Trust.

B. Description of Advisory Services

As a registered investment adviser, GFS provides investment advisory services to pooled investment vehicles (each a “Fund”). GFS is primarily referred to as an operator of managed account platforms, whereby GFS invests Fund assets with third party managers (“Portfolio Managers”) directly or indirectly via investment into indexes on Portfolio Managers’ performance. The Portfolio Managers may employ various strategies and can invest or trade in a wide array of financial instruments, including, but not limited to, equities and fixed income instruments, futures contracts, swaps, currencies, and other derivative instruments. GFS may accommodate various managed account structures that will comply with each respective managed account structure’s jurisdictional requirements. GFS may also accommodate managed account structures required by a specific client by creating a dedicated platform and/or Funds for such client. The investment advisory services provided by GFS may vary from Fund to Fund, and may include some or all of the services described herein. In certain cases, services typically provided by GFS, such as risk or operational management, may be outsourced to third parties. Accordingly, an investor who subscribes to one or more of the Funds may not receive all of the services described below.

Services typically provided by GFS in connection with their managed account platform include some or all of the following services, as relevant: (i) creating the relevant Fund on the current GFS’s umbrella platforms and/or creating a dedicated platform; (ii) entering into the investment management agreement (“IMA”) with the Portfolio Managers; (iii) entering into relevant service provider agreements; (iv) opening the relevant trading accounts; (v) entering into the relevant counterparty agreements; (vi) monitoring and authorization of cash movements; (vii) monitoring the Portfolio Manager’s compliance with pre-defined investment guidelines; (viii) determining the appropriate response to a deviation from the investment guidelines; (ix) monitoring the Portfolio Manager’s general compliance with the IMA; and (x) operational integration and coordination of service providers. Such service providers include the fund trading counterparties, administrators and auditors.

In connection with Funds that enter into Index Instruments (as defined further herein), it is expected that GFS will have additional four principal responsibilities: (i) “fund oversight”, including interaction with the Fund board, preparation of regulatory findings and oversight of all service providers; (ii) “operational management”, including authorizing all subscriptions and redemptions, reinvesting excess cash and cash equivalents, and audit sign-off; (3) “Index Instrument management”, including executing the trade on the relevant Index Instrument, making notional adjustments and collateral

management; and (iv) “index sponsor monitoring”, which involves upfront and ongoing due diligence on the third parties responsible for managing the indices from which the Funds’ returns are generated.

The Funds may also allow subscriptions in various currencies. In such circumstances, GFS will generally perform currency hedging for the Funds.

In certain circumstances it may be necessary to terminate the Portfolio Manager’s authority to manage the assets of a Fund. Following termination, GFS will determine the appropriate method by which the Fund’s assets should be liquidated. GFS may carry out the liquidation or delegate the responsibility to a third-party adviser (including, in most circumstances, the Portfolio Manager).

With respect to the Funds that have synthetic exposure to Portfolio Managers’ investment strategies, GFS also serves as investment manager with discretionary trading authority. Generally, it is expected that the assets of such Funds will be used to enter into one or more synthetic investment instruments, including but not limited to total return swaps, which reference a particular index (“Index Instrument”). Generally, such index will represent performance of a basket of various strategies managed by Portfolio Managers. Such index will typically be constructed and managed by appointed third parties (each an “Index Sponsor”). Additionally, any cash retained in such Funds will be invested pursuant to a cash management strategy determined in its sole discretion by GFS, which may include investments on a short term basis in cash, cash equivalents, money market instruments, and money market collective investment schemes, among others. However, GFS may retain an affiliated or third-party Portfolio Manager to manage any cash retained by the Fund holding an Index Instrument.

Although Funds to which GFS has investment discretion is generally limited to entering into Index Instruments and cash management as described above, GFS may employ other trading strategies on behalf of the Funds pursuant to each Fund’s investment management agreement and investment guidelines.

GFS may also create indexes on the performance of the Portfolio Managers retained by GFS.

C. Tailored Advisory Services

GFS may create new Funds and/or dedicated platforms with customized services to meet individual needs of investors. Such Funds and platforms may be available for subscription and use by multiple clients or be dedicated for a specific client. Additionally, the Firm may enter into agreements with one or more investors which have the effect of altering or supplementing the terms of the offering to the specific investor. Such agreements may grant investors favorable terms with respect to investor fees, reporting and liquidity, among others.

D. Wrap Fee Programs

Guggenheim Fund Solutions does not and does not intend to participate in a wrap fee program.

E. Assets Under Management

As of August 1, 2014, Guggenheim Fund Solutions managed on a discretionary basis, regulatory assets under management of U.S. \$3,229,015,023. Guggenheim Fund Solutions is not managing client assets on a non-discretionary basis.

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FEES AND COMPENSATION

A. Platform Fees

Guggenheim Fund Solutions will charge fees to each Fund that are based on a percentage of net assets under management (“Platform Fees”). The Platform Fee charged to each Fund may vary if an investor invests more money in one or more Funds. Guggenheim Fund Solutions may, at its discretion, waive or reduce such fees for large or strategic investors.

Additionally, in the event GFS retains a Portfolio Manager to manage a Fund, it is expected that such Portfolio Manager will also charge a management fee (the “Management Fee”) and performance fee (the “Performance Fee” and, collectively with the Management Fee, the “PM Fees” collectively with the Platform Fees, the “Fees”) on the Fund they manage.

B. Charging Fees

Guggenheim Fund Solutions calculates and deducts the Platform and the Management Fees from the Funds. Such fees are charged daily, weekly or monthly, as described in more detail in each Fund’s relevant governing documents. Accounts initiated or terminated during the relevant periods will be charged a pro-rated fee. The Performance Fees are generally accrued monthly and paid quarterly or annually.

In certain share classes of the Funds, the Platform and the Management Fee may be combined to provide one asset-based fee for a particular investor or share class.

C. Other Fees and Expenses

Unless otherwise agreed, each Fund, directly or indirectly, also will pay out of its assets all of its ordinary and extraordinary expenses which, depending on the nature of the Fund as well as the specific services to be provided by GFS, may include, but are not limited to: (i) all investment expenses; (ii) all fees and expenses of transactional, risk, market data and trade-related services and information feeds; (iii) all administrative expenses; (iv) all of the charges and expenses of legal advisers, accountants and auditors; (v) all brokers’ commissions, all fees for investment research and/or trade ideas, all borrowing charges on securities sold short and any issue or transfer taxes or stamp duties chargeable in connection with securities transactions; (vi) all taxes and corporate fees and levies payable to governments or agencies or regulatory bodies and the costs of preparing tax returns; (vii) all trustee and directors expenses; (viii) all interest on borrowings, including borrowings; (ix) the fees associated with all regulatory filings and the costs of preparing such filings, including, without limitation, Form PF, CPO-PQR, AIFMD Annex IV reporting, reporting related to trading and/or holding investment instruments and any other necessary reporting; (x) all of the costs of insurance for the benefit of the directors and officers of GFS (if any); (xi) all litigation and indemnification expenses and extraordinary expenses not incurred in the ordinary course of business; (xii) certain expenses that were incurred by Portfolio Managers on behalf of the Funds for purposes of operating such Fund and managing its assets in accordance with the terms of the IMA; and (xiii) all other organizational and operating expenses, including, without limitation, internal and external legal costs associated with the review of the Funds’ trading facilities and account documentation.

Each Fund may also reimburse GFS for its portion of organizational expenses associated with the creation and launch of that new Fund.

D. Timing of Fee Payments

As described above, Platform and Management Fees are charged monthly, weekly or daily as described in more detail in each Fund's relevant governing documents. Accounts initiated or terminated during the relevant periods will be charged a pro-rated fee.

E. Payments to Supervised Persons

GFS has entered into a placement agreement with an affiliated entity, Guggenheim Securities, LLC ("Guggenheim Securities" or "GS"). GS is a registered broker-dealer and certain employees of Guggenheim Fund Solutions are also registered representatives of GS. Although GS does not charge commissions, some of the discretionary year-end bonus compensation received by such employees may be based upon the total amount of assets raised.

The practice of compensating employees or affiliates for soliciting investors to the Funds based upon the amount of assets they raise for such Funds presents a conflict of interest, as it gives Guggenheim Securities or Guggenheim Fund Solutions or their respective employees an incentive to recommend investments based on the compensation received, rather than on an investor's needs. Guggenheim Fund Solutions generally seeks to minimize this conflict of interest by limiting the portion of an employee's compensation directly based upon assets under management. Moreover, each Fund's prospectus contains necessary disclosure of such conflicts.

GFS charges a Platform Fee (as defined in Item 5 above) to each Fund. GS does not charge commission fees. Therefore, GFS does not reduce its Platform Fees for commissions relating to the amount of assets raised by shared employees of GFS and GS. Although GFS and GS do share employees, such employees are not compensated for their placement agent or other broker-dealer activities through commissions, but rather through a discretionary year-end bonus, as determined by GFS. Such discretionary bonus is not charged to investors in any Funds.

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PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Guggenheim Fund Solutions will not charge performance fees for its services. It should be noted, however, that the Portfolio Managers generally will charge performance-based fees for their management of the Funds.

ITEM 7

TYPES OF CLIENTS

Guggenheim Fund Solutions provides advisory services to pooled investment vehicles on a discretionary basis. Such pooled investment vehicles generally operate as exempt investment companies under the Investment Company Act of 1940, as amended.

Each of the Funds and investors are subject to applicable suitability requirements.

ITEM 8

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. Methods of Analysis and Investment Strategies

The descriptions set forth in this Brochure of specific services that Guggenheim Fund Solutions offers should not be understood to limit in any way GFS' activities. GFS may offer any services, engage in any activity and make any advisory decision, including any not described in this Brochure, that Guggenheim Fund Solutions considers appropriate or necessary in the fulfillment of its fiduciary obligation or that it believes is in the best interests of its clients. The investment strategies pursued by the each Fund are speculative and entail substantial risks. Investors should be prepared to bear a substantial loss of capital. There can be no assurance that the investment objectives of any Fund will be achieved. This Brochure does not contain a complete set of risk parameters; please refer to the offering memoranda for a comprehensive list.

As noted in Item 4, the investment advisory services provided by GFS may vary from Fund to Fund, and may include some or all of the services described herein. In certain cases, services typically provided by GFS, such as risk or operational management, may be outsourced to third parties. Accordingly, the methods of analysis described below will not be applicable to all Funds.

GFS has developed a managed account platform intended to mitigate the principal structural risks of direct hedge fund investing. The methods of analysis described below apply only to Funds employing a managed account platform strategy.

Initial Due Diligence and On-boarding of the Portfolio Managers

Although GFS will not allocate assets to Portfolio Managers or recommend Portfolio Managers to clients, GFS will perform initial due diligence followed by ongoing operational oversight on prospective Portfolio Managers that it will retain directly as sub-advisors to the Funds. Initial due diligence is intended to assess the Portfolio Managers' suitability for inclusion on the managed account platform. Primary considerations will include an assessment of the Portfolio Managers' background, operational ability to support a managed account, the suitability of the investment strategy for inclusion on the managed account platform, and the Portfolio Managers' compliance policies. In addition to onsite visits and due diligence performed by GFS employees, GFS also may utilize the services of one or more third party due diligence service providers. This due diligence is designed to confirm a prospective Portfolio Manager's ability to operate an account and it should not be used to replace an investor's own due diligence.

Prior to inclusion on the managed account platform, GFS will agree to a set of investment guidelines within which the Portfolio Manager is expected to manage the assets of the managed account. The investment guidelines are not hard limits, and GFS may waive guidelines and determine the appropriate cure and remedy to deviations from the investment guidelines in its sole discretion. GFS may amend the investment guidelines over time.

Initial Due Diligence of the Index and Index Sponsor

GFS generally perform initial and on-going due diligence on the Index and the Index Sponsor as described further in the offering documents of the relevant Funds. Initial due diligence is intended to assess the suitability of the Index for inclusion on the managed account platform and the processes and procedures of the Index Sponsor in composing and managing the Index. GFS will not conduct due diligence and will not oversee Portfolio Managers whose performance is included into the relevant Index. GFS will not have direct contractual agreements with such Portfolio Managers and will not be involved in

negotiation of investment guidelines, if any, applicable to the Portfolio Managers.

Ongoing Operations

Following satisfactory completion of initial due diligence, GFS will facilitate the inclusion of the Portfolio Manager or the Index on the managed account platform, including: (i) creation of the relevant Fund;; (ii) entering into relevant service provider agreements; (iii) opening the relevant trading accounts; (iv) entering into the relevant counterparty agreements; (v) monitoring and authorization of cash movements; (vi) operational integration, coordination, and oversight of service providers; (vii) hedging for currency risk; (viii) with respect to the Portfolio Managers retained as sub-advisors of the Funds, (a) entering into the IMA, (b) monitoring the Portfolio Manager's compliance with pre-defined investment guidelines, (c) determining the appropriate response to a deviation from the investment guidelines, and (d) monitoring the Portfolio Manager's general compliance with the IMA. Such service providers include the Fund's administrator, auditors, trustee and trading counterparties. In connection with Funds that enter into Index Instruments, GFS will generally also provide (i) "fund oversight", including interaction with the Fund board, preparation of regulatory findings and oversight of all service providers; (ii) "operational management", including authorizing all subscriptions and redemptions, reinvesting excess cash and cash equivalents, and audit sign-off; (3) "Index Instrument management", including executing the trade on the relevant Index Instrument, making notional adjustments and collateral management; and (iv) Index Sponsor monitoring, which involves upfront and ongoing due diligence on the third parties responsible for managing the indices from which the Funds' returns are generated.

In order to conduct its risk oversight, GFS may utilize proprietary databases and applications, as well as third-party applications, service providers and data sources.

Termination and Liquidation

In certain circumstances it may be necessary to terminate the Portfolio Manager's authority to manage the assets of a Fund. Following termination GFS will determine the appropriate method by which the Fund's assets should be liquidated. Generally GFS will instruct the portfolio manager trading the account to liquidate the account. However, in certain limited circumstances when GFS does not believe it is prudent for the Portfolio Manager trading the account to liquidate it, GFS may carry out the liquidation or delegate the responsibility to a third-party adviser.

GFS has discretionary trading authority over the assets of each Fund, which has been delegated to the Portfolio Managers. However, Guggenheim Fund Solutions may be required to exert discretion with respect to any number of day to day activities. Such situations may include, among other things, waiving or amending investment guidelines, updating the valuation policy, deciding which terms to include in counterparty agreements, and even terminating a Portfolio Manager, if necessary. Guggenheim Fund Solutions may engage in any activity or make any advisory decision, including any not described in this Brochure, that Guggenheim Fund Solutions considers appropriate or necessary in the fulfillment of its fiduciary obligation and for the protection of the Funds.

In connection with Funds that enter into Index Instruments, GFS may terminate such Index Instrument pursuant to the terms set forth in the agreement pursuant to which such Index Instrument is established. The Index Instrument terms, including termination, are described in detail in the offering documents of the relevant Fund. It is generally expected that GFS will be able to terminate the Index Instrument at least as of the end of the last business day of each month or more often in certain circumstances or for a fee.

B. Types of Risks

Risks Related to the Managed Account Platforms and the Funds

Listed below are some of the risks associated with operating the Platform. The following explanation of certain risks is not exhaustive, but rather highlights some of the more significant risks involved in the Funds' investment strategies. Some of the risks described below may apply to the Funds directly or indirectly (as risks associated/ imbedded into the relevant Index). For a complete explanation of the Funds' relevant investment strategies and their associated risks, investors in the Funds should review each applicable Fund's offering documents, which may contain additional explanations of strategies, risks and other related details not discussed below.

Past Performance is Not Indicative of Future Results

The markets in which the Funds operate have been severely disrupted over the past few years, so past performance of the Funds may have little relevance to the results obtained in the current environment. Past performance of any Fund is not indicative of the future results of the Fund.

Limited Liquidity

Interests of the Funds will not be freely transferable and may be illiquid. An investor may only redeem its investment in the Fund consistent with the terms set forth in the relevant supplement to the prospectus of each Fund.

Segregated Fund Structure; cross-class liability

Generally, the Funds are structured as sub-funds (sub-trusts or series) of an umbrella entity or umbrella trust, such as an Irish umbrella unit trust, an Irish umbrella PLC, a Cayman segregated portfolio company, or a U.S. Delaware series limited liability company or any similar umbrella entity. Generally that means that the assets of one Fund are not available to meet the liabilities of any other Fund of such umbrella structure. In the event the Fund is a sub-trust of a Trust, the trust is not a legal entity, but instead acts through its management company, which may operate or have assets held on its behalf or be subject to claims in other jurisdictions which may not recognize such segregation. There is no guarantee that the courts of any jurisdiction outside of the home jurisdiction of the relevant umbrella structure will respect the limitations on liability associated with such umbrella structure. Such courts could seek to use the assets held by one Fund to satisfy the liabilities of another Fund of the same umbrella structure.

In addition, if the assets attributable to one class of shares, units or interest of a Fund were completely depleted by trading losses and a trading deficit remained, a creditor could enforce a claim against the assets of any other class of shares, units or interest of the same Fund.

Short Selling

A short sale creates the risk of an unlimited loss, as the price of the underlying security could theoretically increase without limit, thus increasing the cost of buying those securities to cover the short position. There can be no assurance that a Fund will be able to maintain the ability to borrow securities sold short. In such cases, a Fund could be "bought in" (*i.e.*, forced to repurchase securities in the open market in order to return them to the lender). In addition, there can be no assurance that the securities necessary to cover a short position will be available for purchase. In fact, purchasing securities to close out the short position can itself cause the price of the securities to rise further, thereby exacerbating the loss.

Recently a number of jurisdictions, imposed bans on short selling. Regulators and legislators may, at any time, impose additional restrictions on short selling. Specifically, if there are any continued or additional regulatory limitations or bans on short selling, certain strategies employed by certain Portfolio Managers may become uneconomical or impractical to implement, exposing the Funds to potential material losses.

Hedging Transactions

A Portfolio Manager may enter into hedging transactions to seek to reduce risk. Such transactions may not be fully effective in mitigating risk, which may result in losses to a Fund. Furthermore, hedging techniques involve one or more of the following risks: (i) imperfect correlation; (ii) lack of a secondary market; (iii) losses resulting from interest rate, spread or other market movements; (iv) additional margin or other payment requirements; and (v) default or refusal to perform on the part of the counterparty with which the Sub-Fund trades. Additionally, to the extent that any hedging strategy involves the use of over-the-counter derivatives transactions, such a strategy would be affected by implementation of various regulations.

The Funds may also allow subscriptions in various currencies. In such circumstances, GFS or the Portfolio Manager may perform the currency hedge. Such a transaction, although intended to mitigate the risks associated with fluctuation in valuation of currency, may result in losses for the Funds, particularly if such currency hedge transaction is not followed by a corresponding forward transaction.

Convertible Securities

A convertible security may be subject to redemption at the option of the issuer at a price established in the convertible security's governing instrument. If a convertible security held by a Fund is called for redemption, such Fund will be required to permit the issuer to redeem the security, convert it into the underlying common stock or sell it to a third party. Any of these actions could have a material adverse effect on a Fund's performance. Convertible securities are also subject to liquidity risk based on market conditions.

Equity Securities

The value of equity securities and equity derivatives generally will vary with the performance of the issuer and movements in the equity markets and a Fund may suffer losses if it invests in equity instruments of issuers whose performance diverges from the Portfolio Manager's expectations or if equity markets generally move in a single direction and such Fund has not hedged against such a general move.

Fixed Income Securities

Evaluating credit risk for debt securities involves uncertainty and the market for credit spreads is often inefficient and illiquid, making it difficult to accurately calculate discounting spreads for valuing financial instruments. In general, an economic recession could severely disrupt the market for debt securities, have a material adverse effect on the value of such securities and increase the incidence of default for such securities.

Futures Contracts

The prices of futures are highly volatile and futures positions may be illiquid and highly leveraged. Illiquidity of a futures position could prevent a Fund from promptly liquidating unfavorable positions and subject the Fund to substantial losses or from entering into desired trades, especially if a

position is highly leveraged.

Forward Contracts

Forward contracts and options thereon are not traded on exchanges, are not standardized and are not currently regulated. Instead, banks and dealers act as principals in these markets, negotiating each transaction on an individual basis. The principals who deal in the forward markets are not required to continue to make markets in the currencies or commodities they trade, and these markets can experience periods of illiquidity, sometimes of significant duration. There have been periods during which certain participants in these markets have refused to quote prices for certain currencies or commodities, or have quoted prices with an unusually wide spread between the price at which they were prepared to buy and that at which they were prepared to sell. Disruptions can occur in forward markets due to unusually high trading volume, political intervention, or other factors. The imposition of controls by governmental authorities or the implementation of regulations might also limit such forward (and futures) trading to less than that which the Portfolio Manager would otherwise recommend, to the possible detriment of a Fund. Market illiquidity or disruption could result in significant losses to a Fund.

Alternative Investment Strategies

The Funds may implement “alternative investment strategies.” These strategies are characterized by the use of leverage, short selling, high volume trading, relative value and event-driven trading and numerous other techniques not found in a traditional, long-only portfolio. Alternative investment strategies are subject to numerous risks specific only to such strategies, such as episodes of non-correlation between otherwise highly correlated assets, sudden changes in market liquidity and volatility, disparate cash flows on assets intended to be offsetting in respect of the overall risk of a combined position and the risks associated with relying on leverage. Due to the substantial degree of leverage which they frequently use, alternative investment strategies are particularly subject to the risk associated with the “flight to quality” — a market phenomenon occurring when investors sell what they perceive to be higher risk investments and purchase more conservative investments instead, such as U.S. Treasuries. Certain alternative investment strategies that historically performed with consistent success have incurred sudden major (if not total) losses as a result of the “flight-to-quality.” Investors must be prepared for potentially substantial and unpredictable losses.

Different Market Conditions Adverse to Different Portfolio Managers

The strategies implemented by the Portfolio Managers — including those designed to be “market neutral” — will all be subject to some dimension of market risk, including the restricted availability of credit, governmental intervention, directional price movements, deviations from historical pricing relationships, changes in the regulatory environment, changes in market volatility and the “flight-to-quality.”

The diversification of a Fund’s portfolio may not always be significant and, even if significant, may not provide meaningful risk control, even though it may reduce such Fund’s profit potential. The particular or general types of market conditions in which different Portfolio Managers may incur losses cannot be predicted, and several Portfolio Managers may materially underperform other money managers that implement substantially similar investment strategies and approaches. Certain market conditions, such as inflation, shortages of credit, declining stock markets, economic recession and rising interest rates, could materially reduce the profit potential of many of the Funds.

Multiple Levels of Fees

The Funds will bear multiple levels of fees charged by GFS, Portfolio Managers and Index Service

Providers. GFS will charge the Platform Fee or the management fee, as applicable, and each Portfolio Manager will charge a Management Fee and performance-based compensation paid to the Portfolio Managers, as well as various other expenses of the relevant Fund, including Index Sponsor fee, where relevant. In the aggregate, these fees, allocations and expenses can be substantial, could exceed the fees typically incurred from a direct investment in a private investment vehicle managed by a Portfolio Manager and could have a material adverse effect on the value of any investment in a Fund. Moreover, these fees, allocations and expenses may be higher than the fees and expenses of comparable investment vehicles and the impact of these fees could be cumulative.

Operational Risk

Each Fund will depend on GFS, Portfolio Managers, and the Fund's administrator to maintain appropriate procedures to control operational risk. Operational risks may arise, for example, from mistakes made in the confirmation or settlement of transactions, transactions not being properly booked, evaluated or accounted for or other similar disruptions in a Fund's operations that may cause a Fund to suffer financial loss, disruption of its businesses, liability to clients or third parties, regulatory intervention or reputational damage. A Fund's business will be highly dependent on its and its service providers' ability to process, on a daily basis, a large number of transactions across numerous and diverse markets. Consequently, a Fund will rely heavily on financial, accounting and other data processing systems. A Fund will depend on these systems to operate without material problems, although problems will arise from time to time and may have a material adverse effect on a Fund. If a Fund were to suffer any such material adverse effect, any feeder entity holding an investment in such Fund may suffer a material adverse effect.

Systems Risks

Each Fund will depend on various service providers to maintain appropriate systems to facilitate such Fund's activities. Each such service provider may rely extensively on computer programs and systems to trade, clear and settle securities transactions, to evaluate certain securities based on real-time trading information, to monitor the portfolio and net capital and to generate risk management and other reports that are critical to oversight of a Fund's activities. In addition, certain of the Portfolio Managers' or the Index Sponsor's operations will interface with or depend on systems operated by third parties, including prime brokers, securities exchanges and other types of trading systems, market counterparties, custodians and other service providers. Service Providers may not be in a position to verify the risks or reliability of such third-party systems. Furthermore, these programs or systems may be subject to defects, failures or interruptions, including, without limitation, those caused by computer "worms," viruses and power failures. Any such defect or failure could have a material adverse effect on a Fund. For example, such failures could cause the settlement of trades to fail, lead to inaccurate accounting, recording or processing of trades, and cause inaccurate reports, which may affect GFS' ability to monitor the investment portfolios and risks.

In-Kind Distributions

Each Fund expects to distribute cash upon a redemption or withdrawal. However, there can be no assurance that a Fund will have sufficient cash to satisfy redemption requests or withdrawal due to an insufficient amount of cash available to the Fund or the inability of such Fund to liquidate investments at the time of such redemption requests at favorable prices. Under the foregoing circumstances, and under other circumstances deemed appropriate by GFS, a Fund may be required to make an in-kind distribution.

Effect of Substantial Redemptions from a Fund

A number of events could trigger substantial redemptions from a Fund. Actions taken to meet substantial

redemption requests could result in a decrease in prices of assets held by a Fund and an increase in expenses (e.g., transaction costs and the costs of terminating agreements). The overall value of a Fund also may decrease because the liquidation value of certain of its assets may be materially less than their mark-to-market value. A Fund may be forced to sell its more liquid positions, may need to maintain greater amounts of cash and cash-equivalent investments than it would otherwise maintain and may also be restricted in its ability to obtain financing or derivatives counterparties needed for certain investment and trading strategies.

Tracking Error

Although a Fund may seek to track the performance of a private investment vehicle managed by the Portfolio Manager of the corresponding Fund, the investment performance of a Fund may differ materially from the investment performance of such corresponding private investment vehicle. Moreover, due to the different structure of the Funds, the investment experience of a Fund may differ materially from the investment experience of the corresponding private investment vehicle managed by the Portfolio Manager.

Prime Brokerage Firms and Custodians May Fail.

The institutions with whom Funds will do business (i.e., prime brokers and other counterparties) and with whom the Funds' assets will be held, may encounter financial difficulties that may impair the operational capabilities or the capital position of the Funds. No assurance can be given that GFS will be able to successfully determine whether a prime broker may fail. Moreover, if GFS were to make a determination to terminate a prime broker, the transactional and other costs to a Fund required to transfer to a new prime broker (including opportunities lost during such transfer to profit from market volatility and other dislocations) could be material. Such costs may not be fully recoverable by such Fund and such replacement prime broker may not offer the same types of services that the replaced prime broker provided.

Indemnification of the Portfolio Managers

In certain circumstances, a Fund may be required to indemnify its corresponding Portfolio Manager, its affiliates and/or its members, principals, officers and agents. The indemnification obligations could result in substantial fees and expenses to the investors in a Fund and corresponding to a Fund with an indemnification obligation.

Availability of Information; Risk of Fraud

Although Guggenheim Fund Solutions attempts to mitigate the risk of fraud, some of the Portfolio Managers or the Index Sponsor may provide very limited information with respect to their operation and performance, thereby severely limiting GFS' ability to independently verify any representations made by the Portfolio Managers or the Index Sponsor or the investment strategies being employed by the Portfolio Managers on behalf of their existing clients. This may result in significant losses to the relevant Fund based on investment strategies employed by the relevant Portfolio Manager or other actions of the Portfolio Manager and/or the Index Sponsor of which GFS has limited or no knowledge. While GFS will seek to obtain information on a continuing basis regarding the operations of the Fund, no assurance can be given that a Portfolio Manager will not engage in fraud. While GFS will seek to perform all appropriate due diligence on each Portfolio Manager retained as a sub-adviser of the Fund and on each Index Sponsor, it is impossible to predict whether any Portfolio Manager or Index Sponsor will engage in fraudulent behavior or otherwise act to the detriment of a Fund.

Specific Risks of Portfolio Managers' Strategies and Instruments Traded.

Each Fund will be subject to the risks inherent in the strategies pursued by the corresponding Portfolio Manager and the financial instruments held by the Fund. It is not possible in this Brochure to list the types of risk applicable to all the activities in which each Fund may engage. However, the following risks describe the risk relating to the principal investment strategies expected to be undertaken by one or more Portfolio Manager and financial instruments to be held by one or more Funds.

Arbitrage and Relative Value

Successful arbitrage strategies depend on the Portfolio Manager's ability to identify and exploit inefficiencies in the pricing of various securities, financial products or markets. Identification and exploitation of market opportunities involve uncertainty. There can be no assurance that a Portfolio Manager will be able to locate investment opportunities or to correctly exploit price discrepancies. A reduction in the pricing inefficiency of the markets in which a Fund will seek to invest will reduce the scope for the Fund's investment strategies. If the perceived mis-pricings underlying the positions fail to materialize, these investment strategies could be unsuccessful or result in losses to a Fund. This type of strategy may result in high portfolio turnover and, consequently, high transaction costs. Depending upon the investment strategies employed and market conditions, unforeseen events involving such matters as political crises, changes in currency exchange rates or interest rates, forced redemptions of securities or general lack of market liquidity may have a material adverse effect on a Fund. Moreover, there can be no assurance, particularly during periods of market disruption and stress when the risk control benefits of low correlation with traditional benchmarks may be most important, that the performance of a Fund will, in fact, exhibit low correlation with traditional benchmarks or will not be closely correlated with such benchmarks.

Risks Related to OTC FX Transactions and FX markets

Foreign exchange ("FX") rates may be highly volatile and are influenced by many factors. FX rates are influenced by supply and demand, which in turn are influenced by existing and expected rates of inflation, existing and expected interest rate levels, the balance of payments between the relevant countries and government surpluses or deficits in the relevant countries, among other factors. Significant changes, including changes in liquidity and prices, can occur in such markets within very short periods of time. Foreign currency risks include, but are not limited to, convertibility risk, market volatility and potential interference by foreign governments through regulation of local markets, foreign investment or particular transactions in foreign currencies. FX rates may be especially volatile during times of financial turmoil, as capital can flow very quickly out of regions that are perceived to be impacted disproportionately by such turmoil.

Additional Risks Related to Funds that enter into Index Instruments

Risks Related to the Index Instrument

For certain Funds, GFS may employ a strategy where it enters into a synthetic investment instrument, such as total return swap on behalf of such Fund. These swaps may reference a particular index, which is typically constructed and managed by a third party, the Index Sponsor. The Index Sponsor is responsible for the management of the Index, including but not limited to, retaining and supervising portfolio managers whose performance is included into the relevant Index. Each Fund's performance reflects the performance of the investment strategies in the index. There is no assurance that any of these investment

strategies will generate positive returns. Various market factors and circumstances at any time and over any period could cause such strategies to generate negative returns. The failure of one or more of the strategies to generate positive returns will have an adverse impact on the performance of the Index Instrument.

Additionally, positive returns by some strategies may be offset by negative returns by other strategies in the index. Each Fund reflects the aggregated performance of all of the strategies in the index. Even if one or more strategies generates positive returns, the performance of any individual strategy may be offset, in whole or in part, by the performance of one or more of the other strategies.

Tracking Error.

While the Fund's net asset value will be almost exclusively be driven by the level of the index, the Fund will not precisely track the index due to the additional fees and expenses incurred at the Fund level (including, without limitation, the Management Fee) as well as the mechanics of the adjustment of the notional value of the Index Instrument. Additionally, certain disruption events may also result in changes to the value of the index.

Leverage.

Investors should be aware that an Index generally includes an element of leverage. This leverage may amplify the effect of any movements in the relevant markets, which may lead to significant decreases in the index level and could adversely affect the index and the Fund. Leverage will also cause a higher amount of management fees to be deducted from the index in respect of the third party advisers as the use of leverage will provide the index with a greater exposure to the investment strategies in aggregate than would otherwise be the case if leverage were not utilized.

Powers of Third Parties to the Index

The third parties who construct and manage the index, such as an Index Sponsor, have a number of discretions in relation to such index and the exercising of these discretions may have a significant effect on the applicable Fund. In particular, under certain circumstances these entities may have the power to adjust the calculation of the index or postpone or cancel and permanently cease to calculate the index. None of GFS, the Fund or any of their respective affiliates will have any ability to influence the discretion exercised by these third parties to the indices.

ITEM 9

DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or investor's or prospective client's or prospective investor's evaluation of Guggenheim Fund Solutions' advisory business or the integrity of Guggenheim Fund Solutions' management.

ITEM 10

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Broker-Dealer Registration Status

Guggenheim Fund Solutions is not registered as a broker-dealer and does not have an

application pending to register with the SEC as a broker-dealer. Some management persons of Guggenheim Fund Solutions are registered representatives of Guggenheim Securities, LLC an affiliated broker-dealer.

B. CFTC Registration Status

Guggenheim Fund Solutions registered as a commodity pool operator and a commodity trading advisor in November 2012. Some management persons of Guggenheim Fund Solutions are also registered Associated Persons of the commodity pool operator and commodity trading adviser. GFS filed a Notice of Claim pursuant to CFTC Regulation 4.7 for CTA and CPO exemptions from certain reporting requirements on the basis that it provides trading advice to ‘qualified eligible persons’ who meet certain eligibility criteria. In addition, GFS filed a Notice of Claim pursuant to CFTC Regulation 4.13(a)(3) on behalf of certain exempt commodity pools on the basis that such pools are subject to trading limitations with respect to their commodity interest positions.

C. Industry Relationships Material to Advisory Business

GFS Management (Ireland) Limited (“GMIL”), a wholly owned subsidiary of GFS serves as the investment manager to an Irish unit trust (certain of the Funds are structured as sub-trusts of an Irish umbrella unit trust). GMIL has delegated responsibility for the management of the trust to GFS. GMIL does not currently have any operations or personnel. If, in the future, GMIL has any operations and/or personnel, any such personnel who perform investment advisory activities on behalf of GMIL will be subject to the supervision and compliance program of GFS.

Guggenheim Fund Solutions is affiliated with Guggenheim Securities, LLC, a broker-dealer registered with the SEC and a member of the Financial Industry Regulatory Authority (FINRA). Guggenheim Securities serves as placement agent in private offerings on behalf of Guggenheim Fund Solutions (for example, offerings of units/shares of the Funds). A Senior Managing Director of Guggenheim Fund Solutions, and several other employees of Guggenheim Fund Solutions are also registered representatives of Guggenheim Securities and may receive additional compensation based upon the success of the Funds.

Guggenheim Partners Europe Limited is a foreign investment adviser that serves as the promoter of certain of the Funds that are domiciled in Ireland. Retaining a promoter domiciled in Ireland is an Irish regulatory requirement for managing a qualifying investor fund in Ireland.

Guggenheim Investment Advisors (Europe) Limited (“GIA UK”) is a foreign investment advisor that is under common control with Guggenheim Fund Solutions. Three employees of GIA UK are dedicated to Guggenheim Fund Solutions. These individuals are subject to the supervision and compliance program of GFS.

D. Material Conflicts of Interest Relating to Other Investment Advisers

Guggenheim Fund Solutions does not recommend any particular Fund or Portfolio Manager to investors. In certain share classes of the Funds, the Management Fee and any additional management fee charged by the Portfolio Manager may be combined to provide one asset based fee for a particular investor or share class.

ITEM 11

CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

Guggenheim Fund Solutions has adopted a Code of Ethics and Insider Trading Policy (the “Code”) to comply with Rule 204A-1 under the Investment Advisers Act of 1940, as amended (the “Adviser’s Act”), which sets forth standards of business and personal conduct for all GFS employees. The Code is predicated on the basic idea that employees of Guggenheim Fund Solutions will adhere to certain ethical and fiduciary standards and will conduct their affairs in accordance with the principles of professionalism, integrity, honesty and trust.

The Code establishes policies and procedures that are reasonably designed to: (i) prevent fraud and improper personal trading; (ii) identify circumstances that may result in an actual or potential conflict of interest or the appearance thereof; and (iii) provide a means to resolve such conflicts. Investors and prospective investors may request a copy of the Code by contacting Guggenheim Fund Solutions at the address or telephone number listed on the first page of this Brochure. Neither GFS nor any of its related persons recommends securities to the Funds, nor do they buy or sell for the Funds, securities in which GFS or its related persons have a material financial interest.

B. Securities in which the Firm or Related Persons have Financial Interest

Neither GFS nor any of its related persons recommend securities to the Funds. Neither GFS nor its related persons engage in principal transactions with the Funds. Generally, the Code places limitations on personal securities transactions by each employee, and such personal securities transactions are monitored to ensure that a conflict of interest does not arise with securities transactions conducted for any Fund. A Portfolio Manager or other third party adviser may from time to time cause a Fund to invest in a fund or instrument that is issued, managed or advised by an affiliate of Guggenheim Fund Solutions, and such affiliate may earn fees from such investment. These fees earned by the affiliate would be in addition to the Management Fees earned by Guggenheim Fund Solutions.

C. Securities in which the Firm or Related Persons Recommend to the Funds

As described above, neither GFS nor any of its related persons recommend securities to the Funds. As such, neither GFS nor any of its related persons invests in the same securities (or related securities) that they recommend to the Funds.

D. Other Conflicts of Interest

Neither GFS nor any of its related persons buy or sell for the Funds at or about the same time they buy or sell the same securities for their own accounts.

If a Fund was being liquidated by GFS and held illiquid assets, it is possible Guggenheim Fund Solutions would cause such Fund to enter into a cross transaction or a principal transaction with one or more other clients or accounts controlled by an affiliate of GFS. Guggenheim Fund Solutions would do so only after taking into account its fiduciary obligations with respect to each Fund participating in such transactions and other requirements of the Advisers Act and applicable law. If required by applicable law, GFS would seek to obtain the consent of the investors in a corresponding Fund prior to causing a Fund to engage in such a transaction. In addition, Guggenheim Fund Solutions would only permit such transactions by a

Fund if it determined that such transactions are in the best interest of each Fund participating in such transactions and the transactions are executed at fair value in accordance with the Valuation Policy. Neither Guggenheim Fund Solutions nor any related party will receive any compensation in connection with such transactions.

ITEM 12

BROKERAGE PRACTICES

A. Factors Considered in Selecting of Recommending Broker-Dealers for Client Transactions

When a new Fund is launched with a Portfolio Manager as a sub-advisor of such Fund, Guggenheim Fund Solutions attempts to open prime brokerage and other trading accounts with trading counterparties requested by the Portfolio Manager. Accordingly, the prime broker(s) to be used in connection with a new Fund are based upon the Portfolio Manager's recommendations, subject only to approval by Guggenheim Fund Solutions. Guggenheim Fund Solutions generally seeks to obtain a representation from each Portfolio Manager that the prime brokers are selected in accordance with the Portfolio Manager's fiduciary obligation of best execution. Portfolio Managers may, from time to time, select, at the Portfolio Manager's discretion, a GFS affiliated broker-dealer. If specifically requested to do so by the Portfolio Manager, GFS will implement the opening of the trading accounts with such affiliate on behalf of the Fund. Although GFS does not select executing or clearing brokers for the Funds, GFS has selected an introducing broker for certain future commission merchants (FCMs) in order to obtain better pricing and services for the Funds

With respect to Funds that enter into Index Instruments, Guggenheim Fund Solution's discretion will generally be limited to entering into Index Instruments as well as cash management. GFS's discretion to choose a trading counterparty will be limited to a trading counterparty approved by the relevant Index Sponsor. Generally Index Sponsors require the purchasers of an Index Instrument to acquire such contract through a trading counterparty affiliated with the Index Sponsor, in which event GFS will not have any discretion as to what counterparty to trade with to obtain the exposure to the relevant Index. Furthermore, the termination of the relationship with such trading counterparty will result in the loss by the relevant Fund of its exposure to the Index. It is expected that, in the event the Fund cannot have an exposure to the relevant Index any longer, GFS will liquidate such a Fund. As described above, it is not expected that GFS will be selecting or recommending broker-dealers for these Funds. Accordingly, numbers 1, 2 and 3 below are only in reference to the managed account platform.

1. Research and Other Soft Dollar Benefits

Each Fund will pay its own brokerage commissions. Generally, when an account uses brokerage commissions (or markups or markdowns) to obtain research or other products or services, the investment adviser to the account receives a benefit because the adviser does not have to produce or pay for the research, products or services received from the broker. Accordingly, the investment adviser may have an incentive to select or recommend a broker based on the adviser's interest in receiving the research, products or services, which can create a conflict of interest between the adviser's interests and the Funds' interests in receiving the most favorable execution. Additionally, the benefits received by an adviser may be paid for or generated by all of the adviser's client accounts though only a portion of the adviser's client accounts receive a benefit from the research, products or services obtained.

Guggenheim Fund Solutions will not select brokers to execute transactions. The Portfolio Managers will select the brokers with whom individual trades are executed, which could include a broker-dealer that is affiliated with Guggenheim Fund Solutions. Further, Guggenheim Fund Solutions will not instruct nor

recommend brokers to the Portfolio Managers. Guggenheim Fund Solutions generally will not have any soft dollar arrangements with respect to the Funds. However, Guggenheim Fund Solutions may receive research reports or pricing information from some of the prime brokers by virtue of its performance of services for the Funds. Although receipt of research and/or pricing information is beneficial to Guggenheim Fund Solutions and may assist in verifying independent valuations of portfolio level securities, GFS believes a conflict of interest should not arise because Guggenheim Fund Solutions does not select or recommend any particular brokers to the Portfolio Managers.

Certain of the Portfolio Managers may have soft dollar arrangements. Generally the IMAs between the Portfolio Managers and the Funds do not permit such advisers to enter into any “soft dollar” arrangement with a broker-dealer unless either (a) the soft dollar arrangement is within the safe harbor of Section 28(e) of the Securities Exchange Act of 1934, as amended (the “Exchange Act”); or (b) Guggenheim Fund Solutions has otherwise been notified of such arrangement or has authorized such arrangement in writing. Generally, soft dollar services include research products and services, quotation equipment and computer-related costs and expenses.

In the event Guggenheim Fund Solutions were required to terminate a Portfolio Manager and decided to liquidate a Fund without appointing a new Portfolio Manager, Guggenheim Fund Solutions may be in a position to select brokers. Under such circumstances, Guggenheim Fund Solutions would select brokers based upon best execution and does not intend to enter into any soft dollar agreement with such brokers.

2. Brokerage for Client Referrals

Guggenheim Fund Solutions does not currently select or recommend either executing or clearing brokers and, therefore does not recommend brokers in return for client or investor referrals.

3. Directed Brokerage

Guggenheim Fund Solutions generally does not select executing brokers. Accordingly, neither the Funds nor its investors direct GFS to execute transactions through a specific broker-dealer.

B. Aggregated or “Bunched” Orders

Due to Guggenheim Fund Solutions’ current business operations, GFS currently does not aggregate orders across multiple accounts.

With respect to the managed account platform, the Portfolio Managers will select the brokers with whom individual trades are executed. The IMAs with the Portfolio Managers generally provide that the Portfolio Manager may place aggregated orders and requires the Portfolio Managers to allocate trades in a manner that is fair and equitable to all accounts or otherwise reasonably acceptable to Guggenheim Fund Solutions.

ITEM 13

REVIEW OF ACCOUNTS

A. Review of Client Accounts

Each Fund’s portfolio generally is reviewed by GFS daily, weekly and monthly. The review includes monitoring the daily profit and loss, net asset value calculations and trade reconciliations performed by

each Fund's administrator. Such reviews will be conducted by GFS' Head of Operations and her team.

In connection with the managed account platform, Guggenheim Fund Solutions also will review and monitor compliance by each Portfolio Manager with the investment restrictions and risk guidelines for the Fund it advises. This review generally will be performed on a daily basis by GFS' Chief Risk Officer and his team.

B. Factors that May Trigger a Review of Client Accounts

A review of a Fund, other than described above, may also be triggered by changes in market conditions, change of security positions, changes in investment objectives or policies or capital inflows/outflows, among other reasons.

C. Context and Frequency of Reports

Investors in each Fund will receive monthly unaudited statements showing the net asset value ("NAV"), changes in NAV, account activity and investment performance in which each respective investor has made an investment. In addition, investors also receive daily profit and loss statements and risk reports. On an annual basis, investors also will receive copies of the audited financial statements prepared as of December 31 of each year in accordance with generally accepted accounting principles by KPMG LLP (or another accounting firm registered with, and subject to regular inspection by, the Public Company Accounting Oversight Board). Such annual audited financial statements will be distributed to investors within 120 days of the Fund's fiscal year end, in accordance with the requirements under Rule 206(4)-2 of the Advisers Act. To the extent the Fund is a commodity pool, each investor will receive an annual report containing the information requirement by CFTC Rule 4.7(b)(3) within 90 calendar days after the end of the Fund's fiscal year.

ITEM 14

CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefit for Providing Services to Non-Clients

Guggenheim Fund Solutions will not receive economic benefits from non-clients for providing investment advice and other advisory services to the Funds.

B. Compensation to Non-Supervised Persons for Client Referrals

Guggenheim Fund Solutions may compensate its own personnel, affiliates, employees of its affiliates, or third-party solicitors, placement agents, finders, distributors or similar persons who refer potential investors to GFS or solicit investors. Any such compensation will be paid by GFS and will not be charged to its investors or the Funds. Such solicitation fees may be calculated as a percentage of the Management Fees actually received by Guggenheim Fund Solutions with respect to such investors. If applicable, any such arrangement with a solicitor will comply with Rule 206(4)-3 under the Advisers Act.

ITEM 15

CUSTODY

Under Rule 206(4)-2 of the Advisers Act, GFS will be deemed to have custody of the securities and other

assets of the Funds, even though GFS will not physically hold the securities and other assets, and such securities and assets are not held or registered in GFS' name. Guggenheim Fund Solutions is exempt from certain provisions of Rule 206(4)-2 because the Funds are audited in accordance with U.S. generally accepted accounting principles on an annual basis by an independent public accountant that is registered with, and subject to regular inspection by, the Public Company Accounting Oversight Board. Audited financial statements will be distributed to each investor of each Fund within 120 days of the end of such Fund's fiscal year.

ITEM 16

INVESTMENT DISCRETION

In general, GFS generally does not allocate assets and has delegated day to day discretionary trading authority over the accounts to the Portfolio Managers. Guggenheim Fund Solutions will not recommend Portfolio Managers to investors. However, Guggenheim Fund Solutions may be required to exert discretion with respect to any number of day to day activities of the Funds. Such situations may include, among other things, waiving or amending investment guidelines, providing guidance to a Portfolio Manager on how to get back into compliance with investment guidelines, updating the valuation policy, deciding which terms to include in counterparty agreements, and even terminating a Portfolio Manager if necessary. This is not intended to be an exhaustive list of the types of activities that may arise which require Guggenheim Fund Solutions to exhibit reasonable discretion. GFS' authority regarding the Funds will be contained in each Fund's governing documents.

As stated in Item 4, GFS has investment discretion of certain Funds which generally involves entering into Index Instruments on behalf of such Funds. This discretionary authority is provided in the applicable Fund's governing documents. GFS will buy and sell financial instruments for the Funds on a discretionary basis in a manner that is consistent with each Fund's stated investment objectives and restrictions.

ITEM 17

VOTING CLIENT SECURITIES

Guggenheim Fund Solutions has adopted proxy voting policies and procedures ("Proxy Voting Guidelines") to ensure that any proxy voted on behalf of the Funds is voted in a manner which is in the best interests of its Funds pursuant to Advisers Act Rule 206(4)-6.

The Portfolio Managers are typically responsible for the voting of proxies on behalf the Funds. Generally, the Portfolio Managers will be registered with the SEC as Investment Advisers under the Advisers Act and are required to have proxy voting policies in accordance with Advisers Act Rule 206(4)-6 and to vote proxies in accordance with the best interests of their clients. Accordingly, the IMA with each Portfolio Manager requires each Portfolio Manager to have such a policy and fulfill its obligation to vote proxies in the best interests of its clients. Guggenheim Fund Solutions generally will not vote proxies on behalf of the Funds unless specifically instructed in writing to do so, or as otherwise required.

To the extent a Portfolio Manager is not registered with the SEC, or does not otherwise have proxy voting policies, Guggenheim Fund Solutions may retain a third-party vendor to vote proxies on behalf of the Fund in accordance with the GFS Proxy Voting Guidelines.

Although GFS does maintain some trading discretion of certain Funds, it does not expect to hold instruments that require a proxy vote. However, in the event GFS is required to vote proxies, GFS will

do so in a manner which is in the best interest of the Funds and in accordance with GFS' Proxy Voting Guidelines.

Guggenheim Fund Solutions' Proxy Voting Guidelines may be changed from time to time. A copy of Guggenheim Fund Solutions' proxy voting policy and summary of the Proxy Voting Guidelines, or information on how Guggenheim Fund Solutions voted proxies, is available to clients and investors upon request. Please contact Guggenheim Fund Solutions, LLC at 135 East 57th Street, 21th Floor, New York, NY 10022, Attn: Investor Relation Services, with any questions.

ITEM 18

FINANCIAL INFORMATION

Guggenheim Fund Solutions will not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance and, thus is not required to include a balance sheet for its most recent fiscal year.

Guggenheim Fund Solutions is not aware of any financial condition that is likely to impair its ability to meet contractual commitments to clients. Guggenheim Fund Solutions has not been the subject of a bankruptcy petition at any time during the past ten years.