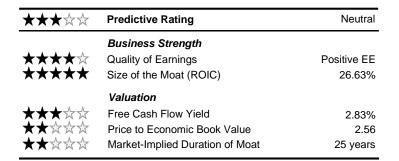
New Constructs®

Closing ETF Price as of 10/03/11: \$38.23

RPG - Neutral Rating

Rydex S&P 500 Pure Growth ETF





10/04/11

- We recommend investors hold Rydex S&P 500 Pure Growth ETF
- RPG ranks in the 56th percentile of the 400+ ETFs we cover.
- Positive EE means that economic earnings are positive because the ETF's ROIC is greater than its WACC.
- The Price to Economic Book Value ratio compares market expectations for future cash flows to existing cash flows. When the ratio is greater than one, the market predicts cash flows will increase,
- Market-Implied Duration of Moat measures the number of years of future profit growth implied by the stock price.

ETF Details

Net Asset Value (\$MM)	\$294.61
Issuer	Rydex
Category	Large Cap Growth Equities
Index	S&P 500/Citigroup Pure Growth
Management Style	Passive
Exposure	Long
Inception Date	03/01/06
Number of Holdings	127
Premium (Discount)	-0.08%
Avg. Daily Volume (3 Mo.)	175,803
Geography	U.S.

Predictive Rating Methodology

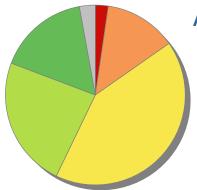
Our rating is based on the aggregation of our financial models for the ETF's holdings, which enables us to assess the profitability and valuation of the ETF just like a stock.

Our predictive ETF rating system is the same as our stock rating system, consistently top-ranked by Barron's.

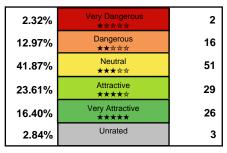
Expense Analysis

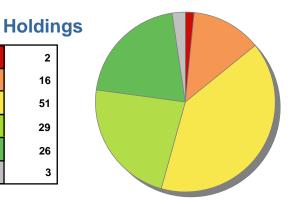
Expense Ratio	0.35%
Rank (percentile)	58.39%
10-Year Cost	\$893.64

RPG's fees will cost an investor \$893.64 over 10 years assuming a \$10,000 investment and 10% returns.



Allocations





Top 5 Holdings

Chipotle Mexican Grill, Inc. (CMG)	2.19%
Apple Inc. (AAPL)	2.15%
Amazon.com Inc. (AMZN)	2.15%
priceline.com Inc. (PCLN)	1.96%
Cognizant Technology Solutions Corp (CTSH)	1.57%

Capitalization Exposure

Large Cap	50.65%
Mid Cap	48.30%
Small Cap	1.04%

10/04/11

Explanation of Predictive ETF Rating System

Our ETF research aggregates results from our Company Valuation models for each of the companies held by an ETF. Our rating system grades ETFs according to the 5 most important criteria for assessing the risk versus reward of an ETF. Our analysis results in the 5 ratings: Very Attractive corresponds to a "Strong Buy" rating, Attractive to "Buy", Very Dangerous to a "Sell or Short", and everything in-between to a "Hold" rating.

Predictive	Business Strength		Valuation		
Risk/Reward Rating	Quality of Earnings	Size of Moat (ROIC)	FCF Yield	Price to Economic Book Value	Market-Implied Duration of Moat
Very Dangerous ★☆☆☆☆	Misleading Trend	Bottom Quintile	< -5%	> 3.5 or -1 < 0	> 50
Dangerous ★★☆☆	False Positive	4th Quintile	-5% < -1%	2.4 < 3.5 or < -1	20 < 50
Neutral ★★★☆	Neutral EE	3rd Quintile	-1% < 3%	1.6 < 2.4	10 < 20
Attractive ★★★☆	Positive EE	2nd Quintile	3% < 10%	1.1 < 1.6	3 < 10
Very Attractive ★★★★	Rising EE	Top Quintile	> 10%	0 < 1.1	0 < 3

New Constructs® - Profile

Incorporated in July 2002, New Constructs is an independent publisher of investment research that provides clients with consulting, advisory and research services. We specialize in quality-of-earnings, forensic accounting and discounted cash flow valuation analyses for all U.S. public companies.

How New Constructs Creates Value for Clients

- Superior Recommendations Our stock-picks consistently outperform. See our track record in our stock-picking accolades and Proof Is In Performance reports.
- More Accurate Research Our patented Research Platform for reversing accounting distortions and discounted cash flow analysis leverages better data to deliver smarter research.
- Time Savings We check the fine print in thousands of corporate filings so you don't have to. As reported by Barron's, our expertise in analyzing SEC filings delivers Hidden Gems and Red Flags that drive long-term stock-picking success.
- Transparency We are proud to share the results of our analysis of over 50,000 10-Ks. See the Corporate Disclosure Transgressions report we provided to the SEC. Our reports detail all data and assumptions. Company Models enable users to change them.
- Objectivity New Constructs is an independent research firm, not tied to Wall Street or investment banking services. See our presentation to the Senate Banking Committee, the SEC and many others in DC.

Our Philosophy About Research

Accounting data is not designed for equity investors, but for debt investors. Accounting data must be translated into economic earnings to understand the profitability and valuation relevant to equity investors. Respected investors (e.g. Adam Smith, Warren Buffett and Ben Graham) have repeatedly emphasized that accounting results should not be used to value stocks. Economic earnings are what matter because they are:

- 1. Based on the complete set of financial information available.
- Standard for all companies.
- A more accurate representation of the true underling cash flows of the business.

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