See separate instructions.

## Part I Reporting Issuer

| 1 Issuer's name  |   | 2 Issuer's employer identification number (EIN)              |  |  |
|--|---|--|--|--|
| Guggenheim Strategic Opportunities Fund  | 20-5997403                              |  |  |  |
| 3 Name of contact for additional information   | Telephone No. of contact                | 5 Email address of contact                                   |  |  |
| Glenn McWhinnie  | 312-357-0356                            | glenn.mcwhinnie@guggenheiminvestments.com                    |  |  |
| 6 Number and street (or P.O. box if mail is not d  | elivered to street address) of contact  | 7 City, town, or post office, state, and ZIP code of contact |  |  |
| 227 West Monroe Street, 7th Floor  | Chicago, IL 60606                       |  |  |  |
| 8 Date of action   | 9 Classification and description        | Classification and description                               |  |  |
| 1/15/21  | PAID A "RETURN OF CAPITAL" DISTRIBUTION |  |  |  |
| 10 CUSIP number 11 Serial number(s)  | 12 Ticker symbol                        | 13 Account number(s)   |  |  |
| 40167F101  | GOF                                     |  |  |  |
| Part II Organizational Action Attach   | additional statements if needed. See ba | ack of form for additional questions.                        |  |  |
| Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action  RETURN OF CAPITAL (ROC) DISTRIBUTION AS PART OF THE FOLLOWING DISTRIBUTIONS: |   |  |  |  |
|  |   |  |  |  |
| 6/15/2020  |   |  |  |  |
| 7/15/2020  | 0.07072                                 |  |  |  |
| 8/14/2020  | 0.1821000                               | 0.094692   |  |  |
| 9/15/2020  | 0.1821000                               | 0.094692   |  |  |
| 10/15/2020   | 0.1821000                               | 0.094692   |  |  |
| ······································   | 0.1821000                               | 0.094692   |  |  |
| 11/13/2020   | 0.021000 0.071072                       |  |  |  |
| 12/15/2020   | 0.1821000                               | 0.094692   |  |  |
|  |   |  |  |  |

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► THE ABOVE ACTION WILL REDUCE THE COST BASIS OF THE SHAREHOLDER'S SECURITY.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► N/A

For Paperwork Reduction Act Notice, see the separate Instructions.

| Form 8 | 3937 (12-20 | 17)   | r aye 🖿                                   |
|--------|-------------|---|---|
| Par    | tll O       | rganizational Action (continued)  |   |
| 7      |             | oplicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is bas  | sed IRC SECTIONS §312 & §316              |
|        |             |   |   |
|        |             |   |   |
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|        |             |   |   |
| 8      | Can any     | resulting loss be recognized?  N/A  |   |
| •      | oundry      |   |   |
|        |             |   |   |
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|        |             |   |   |
|        |             |   | NVA                                       |
| 19     | Provide     | any other information necessary to implement the adjustment, such as the reportable tax year $\blacktriangleright$  | <u>N/A</u>                                |
|        |             |   |   |
|        |             |   |   |
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|        |             |   |   |
|        |             |   |   |
|        |             |   |   |
|        |             | r penalties of perjury, I declare that I have examined this return, including accompanying schedules and state  | ements and to the best of my knowledge an |
|        | Unde        | r penalties of perjury. I declare that I have examined this return, including accompanying schedules and state<br>, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of whic | ch preparer has any knowledge.            |
| Sig    |             |   |   |
| He     |             | iture ► Dlen Miline Date ►  | 1/15/21                                   |
|        | - Olgri     |   |   |
|        | Print       | your name Stern New Minne   |   |
| Pa     | id          | Print/Type preparer's name Preparer's signature Date  | Check if PTIN<br>self-employed            |
|        | eparer      |   | Firm's EIN ►                              |
|        | e Only      | Firm's name   | Phone no.                                 |
|        | -           | Firm's address 🕨  |   |

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054