

# CITY of LAGUNA WOODS INVESTMENT POLICY REVIEW COMMITTEE AGENDA

Special Meeting  
Thursday, March 2, 2023  
11:30 a.m.

Laguna Woods City Hall  
24264 El Toro Road  
Laguna Woods, California 92637

Shari L. Horne  
Councilmember  
(Chair)



Annie McCary  
Councilmember

*Welcome to a meeting of the Laguna Woods Investment Policy Review Committee!*

*This meeting may be recorded, televised, and made publicly available.*

Public Comments: Persons wishing to address the Committee are requested to complete and submit a speaker card to City staff. Speaker cards are available near the entrance to the meeting location. Persons wishing to address the Committee on an item appearing on this agenda will be called upon at the appropriate time during the item's consideration. Persons wishing to address the Committee on an item *not* appearing on the agenda will be called upon during the "Public Comments" item. Persons who do not wish to submit a Speaker Card, or who wish to remain anonymous, may indicate their desire to speak from the floor. Speakers are requested, but not required, to identify themselves.

Americans with Disabilities Act (ADA): It is the intention of the City to comply with the ADA. If you need assistance to participate in this meeting, please contact either the City Clerk's Office at (949) 639-0500/TTY (949) 639-0535 or the California Relay Service at (800) 735-2929/TTY (800) 735-2922. The City requests at least two business days' notice in order to effectively facilitate the provision of reasonable accommodations.

REGULAR MEETING SCHEDULE

The Laguna Woods Investment Policy Review Committee regularly meets on at least a biannual basis.

AGENDA POSTING AND AVAILABILITY

Regular and Adjourned Regular Meetings: Pursuant to California Government Code Section 54954.2 of the Ralph M. Brown Act, the City of Laguna Woods posts agendas at Laguna Woods City Hall, 24264 El Toro Road, Laguna Woods, California 92637; on the City’s website ([www.cityoflagunawoods.org](http://www.cityoflagunawoods.org)); and, at other locations designated by Resolution No. 17-30, at least 72 hours in advance of regular and adjourned regular meetings. Agendas and agenda materials are available at Laguna Woods City Hall during normal business hours and on the City’s website. Printed copies of agendas and agenda materials are provided at no charge in advance of meetings. After meetings have occurred, a per page fee is charged for printed copies.

Special and Emergency Meetings: Agenda posting and availability for special and emergency meetings is conducted pursuant to all applicable provisions of California Government Code (Ralph M. Brown Act).

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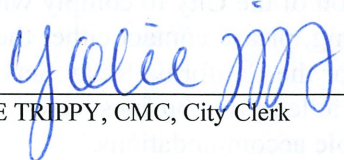
FOR ADDITIONAL INFORMATION

For additional information, please contact the City Clerk’s Office at (949) 639-0500/TTY (949) 639-0535, [cityhall@cityoflagunawoods.org](mailto:cityhall@cityoflagunawoods.org), or 24264 El Toro Road, Laguna Woods, California 92637.

AFFIDAVIT OF POSTING

STATE OF CALIFORNIA     )  
COUNTY OF ORANGE     ) ss.  
CITY OF LAGUNA WOODS    )

I, Yolie Trippy, City Clerk, City of Laguna Woods, hereby certify under penalty of perjury that this agenda was posted at Laguna Woods City Hall, 24264 El Toro Road, Laguna Woods, California 92637; on the City’s website ([www.cityoflagunawoods.org](http://www.cityoflagunawoods.org)); and, at other locations designated by Resolution No. 17-30, pursuant to California Government Code Section 54954.2 of the Ralph M. Brown Act.

  
\_\_\_\_\_  
YOLIE TRIPPY, CMC, City Clerk

2/27/23  
\_\_\_\_\_  
Date

## OPTIONS FOR PUBLIC COMMENTS

### **1. Attend the meeting in-person.**

**2. Submit public comments in writing.** Written public comments may be submitted via email ([cityhall@cityoflagunawoods.org](mailto:cityhall@cityoflagunawoods.org)) or by mail (Laguna Woods City Hall, 24264 El Toro Road, Laguna Woods, CA 92637), provided that they are received by the City prior to 11:30 a.m. on the day of the meeting. Written public comments may be read or summarized to the Committee at the meeting, and parties submitting comments should be aware that their email addresses and any information submitted may be disclosed or become a matter of public record. No party should expect privacy of such information.

**3. Make public comments by telephone.** Dial (669) 444-9171. When prompted enter the following meeting ID: 826 6298 4244 followed by pound (#) and the following meeting passcode: 899446 followed by pound (#). When an item you wish to comment on is discussed, press \*9 on your telephone to raise your hand. When it is your turn, you will be unmuted and able to speak. Please note that your telephone number will be visible to the City. No party should expect privacy of such information.

### **4. Make public comments by computer.**

- Visit [www.zoom.us](http://www.zoom.us)
- Click on “Join a Meeting” toward the top right of the webpage
- Enter the following meeting ID: 826 6298 4244
- Open the Zoom application following the on-screen prompts
- Enter the following meeting password: 899446
- Enter a name and email address as required by Zoom

When an item you wish to comment on is discussed, click on “Raise Hand.” When it is your turn, you will be unmuted and able to speak. Please note that information you enter into Zoom will be visible to the City. No party should expect privacy of such information.

## **I. CALL TO ORDER**

Introductory Note: Members of the public wishing to address the Committee on items appearing on this agenda are advised to indicate their interest in doing so at the time an item is considered by

notifying City staff if present in-person, pressing \*9 on their telephone if participating by telephone, or clicking on “Raise Hand” if participating by computer via Zoom. Members of the public wishing to address the Committee on items *not* appearing on this agenda may do so during Item IV.

## **II. ROLL CALL**

## **III. PLEDGE OF ALLEGIANCE**

## **IV. PUBLIC COMMENTS ON NON-AGENDA ITEMS**

About Public Comments on Non-Agenda Items: This is the time and place for members of the public to address the Committee on items *not* appearing on this agenda. To indicate interest, please notify City staff if present in-person, press \*9 on your telephone if participating by telephone, or click on “Raise Hand” if participating by computer via Zoom. Pursuant to state law, the Committee is unable to take action on such items, but may engage in brief discussion, provide direction to City staff, or schedule items for consideration at future meetings.

## **V. COMMITTEE BUSINESS**

### **5.1 Investment Policy Review Committee Chair**

*Recommendation:* Appoint a member of the Investment Policy Review Committee to serve as its Chair to conduct meetings and attest to meeting minutes.

### **5.2 Investment Policy Review Committee Minutes**

*Recommendation:* Approve the Investment Policy Review Committee meeting minutes for the special meeting on August 24, 2022.

### **5.3 Investment of Financial Assets Policy**

*Recommendation:* Provide direction to staff regarding potential modifications to Administrative Policy 2.2 (Investment of Financial Assets) to ensure its continued adequacy and effectiveness.

## **VI. COMMITTEE MEMBER COMMENTS**

## **VII. ADJOURNMENT**



# City of Laguna Woods

## NOTICE OF SPECIAL INVESTMENT POLICY REVIEW COMMITTEE MEETING

**MARCH 2, 2023**

Please be advised that a special meeting of the Investment Policy Review Committee will be held on March 2, 2023 at 11:30 a.m. The meeting will be held at Laguna Woods City Hall, 24264 El Toro Road, Laguna Woods, California 92637.

The agenda for this meeting is attached.

For additional information, please contact the City Clerk's Office at (949) 639-0500/TTY (949) 639-0535, [cityhall@cityoflagunawoods.org](mailto:cityhall@cityoflagunawoods.org), or 24264 El Toro Road, Laguna Woods, California 92637.

A handwritten signature in blue ink, appearing to read "Shari L. Horne", is written over a horizontal line.

SHARI L. HORNE, Councilmember (Chair)

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**5.1**  
**INVESTMENT POLICY REVIEW COMMITTEE**  
**CHAIR**  
***(NO REPORT)***

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**5.2**  
**INVESTMENT POLICY REVIEW COMMITTEE**  
**MINUTES**

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**CITY OF LAGUNA WOODS CALIFORNIA  
INVESTMENT POLICY REVIEW COMMITTEE MINUTES  
SPECIAL MEETING  
August 24, 2022  
3:30 P.M.  
Laguna Woods City Hall  
24264 El Toro Road  
Laguna Woods, California 92637**

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**I. CALL TO ORDER**

Councilmember Horne called the Special Meeting of the Investment Policy Review Committee of the City of Laguna Woods to order at 3:30 p.m.

**II. ROLL CALL**

COMMITTEE MEMBERS: PRESENT: Tao, Horne  
ABSENT: -

All committee members participated via teleconference.

STAFF PRESENT: City Manager Macon, Administrative Services Director/City  
Treasurer Torres, City Clerk Trippy

All staff participated in-person at the meeting location.

**III. PLEDGE OF ALLEGIANCE**

Councilmember Tao led the pledge of allegiance.

**IV. PUBLIC COMMENTS ON NON-AGENDA ITEMS – None**

**V. COMMITTEE BUSINESS**

**5.1 Investment Policy Review Committee Minutes**

Moved by Councilmember Tao, seconded by Councilmember Horne, and carried unanimously on a 2-0 vote, to approve the Investment Policy Review Committee meeting minutes for the special meeting on March 21, 2022. This vote was conducted by roll call.

**5.2 Investment of Financial Assets Policy**

City Manager Macon noted that proposed modifications to the investment policy were included in the agenda packet and reflect that the existing investment policy was certified by the California Municipal Treasurers Association (“CMTA”).

City Manager Macon also reviewed the three scorecards received from CMTA, which were included in the agenda packet. City Manager Macon noted that staff's intent is to propose modifications to the investment policy based on the CMTA scorecards at the next Investment Policy Review Committee meeting.

City Manager Macon commented on state law applicable to delegating the City Council's investment authority to the City Treasurer and staff's rationale for recommending that such delegation occur.

Committee members discussed the item and staff answered related questions.

Moved by Councilmember Horne, seconded by Councilmember Tao, and carried unanimously on a 2-0 vote, to:

1. Recommend that the City Council adopt modifications to Administrative Policy 2.2 (Investment of Financial Assets) to reflect certification by the California Municipal Treasurers Association dated June 27, 2022.

AND

2. Recommend that the City Council renew its delegation of investment authority to the City Treasurer pursuant to California Government Code Section 53607 for a one-year period.

This vote was conducted by roll call.

**VI. COMMITTEE MEMBER COMMENTS – None**

**VII. ADJOURNMENT**

The meeting was adjourned at 3:57 p.m.

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YOLIE TRIPPY, CMC, City Clerk

Approved: March 2, 2023

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SHARI L. HORNE, Chair

## **5.3 INVESTMENT OF FINANCIAL ASSETS POLICY**

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# CMTA Investment Policy Scorecard

NAME OF ENTITY: City of Laguna Woods			
EVALUATOR: Rick Phillips			
SECTION 2 – SCOPE – MAX 5 POINTS	5	SECTION 11 – COLLATERALIZATION – MAX 5 POINTS	5
SECTION 3 – PRUDENCE – MAX 5 POINTS	5	SECTION 12 – SAFEKEEPING AND CUSTODY – MAX 5 POINTS	5
SECTION 4 – OBJECTIVE – MAX 5 POINTS	5	SECTION 13 – DIVERSIFICATION – MAX 5 POINTS	5
SECTION 5 – DELEGATION OF AUTHORITY – MAX 5 POINTS	5	SECTION 14 – MAXIMUM MATURITIES – MAX 5 POINTS	5
SECTION 6 – ETHICS AND CONFLICTS OF INTEREST – MAX 5 POINTS	5	SECTION 15 – INTERNAL CONTROLS – MAX 5 POINTS	5
SECTION 7 – AUTHORIZED DEALERS & INSTITUTIONS – MAX 5 POINTS	5	SECTION 16 – PERFORMING STANDARDS – MAX 5 POINTS	0
SECTION 8 – AUTHORIZED & SUITABLE INVESTMENTS – MAX 10 POINTS	8	SECTION 17 – REPORTING – MAX 10 POINTS	10
SECTION 9 – REVIEW OF INVESTMENT PORTFOLIO – MAX 5 POINTS	5	SECTION 18 – INVESTMENT POLICY ADOPTION – MAX 5 POINTS	5
SECTION 10 – INVESTMENT POOLS/MUTUAL FUNDS – MAX 5 POINTS	5	SECTION 19 – GLOSSARY – MAX 5 POINTS	5
<b>TOTAL</b>	<b>48</b>	<b>TOTAL</b>	<b>45</b>
			<b>GRAND TOTAL</b>
			<b>93</b>
CERTIFIED (85 POINTS OR ABOVE):			
<input checked="" type="radio"/> YES		<input type="radio"/> NO	
EVALUATOR COMMENTS:			
<p>Section 8-Authorize &amp; Suitable Investments: If I’m reading the Authorized Investments table in the Policy correctly, the City can only invest 20% in U.S. Treasuries. This is not common. I suggest the City review that to ensure that is what is desired.</p> <p>Section 16-Performing Standards: The Policy is missing this section. Please refer to CMTA’s Model Policy for suggested language.</p> <p>I really like the City’s “Public Trust” section. I rarely see this in policies.</p>			



# CMTA Investment Policy Scorecard

NAME OF ENTITY:				
City of Laguna Woods				
EVALUATOR:				
Mary-Ann Rexroad				
SECTION 2 – SCOPE – MAX 5 POINTS	5	SECTION 11 – COLLATERALIZATION – MAX 5 POINTS	5	
SECTION 3 – PRUDENCE – MAX 5 POINTS	4	SECTION 12 – SAFEKEEPING AND CUSTODY – MAX 5 POINTS	5	
SECTION 4 – OBJECTIVE – MAX 5 POINTS	5	SECTION 13 – DIVERSIFICATION – MAX 5 POINTS	5	
SECTION 5 – DELEGATION OF AUTHORITY – MAX 5 POINTS	4	SECTION 14 – MAXIMUM MATURITIES – MAX 5 POINTS	3	
SECTION 6 – ETHICS AND CONFLICTS OF INTEREST – MAX 5 POINTS	4	SECTION 15 – INTERNAL CONTROLS – MAX 5 POINTS	5	
SECTION 7 – AUTHORIZED DEALERS & INSTITUTIONS – MAX 5 POINTS	5	SECTION 16 – PERFORMING STANDARDS – MAX 5 POINTS	0	
SECTION 8 – AUTHORIZED & SUITABLE INVESTMENTS – MAX 10 POINTS	9	SECTION 17 – REPORTING – MAX 10 POINTS	10	
SECTION 9 – REVIEW OF INVESTMENT PORTFOLIO – MAX 5 POINTS	5	SECTION 18 – INVESTMENT POLICY ADOPTION – MAX 5 POINTS	5	
SECTION 10 – INVESTMENT POOLS/MUTUAL FUNDS – MAX 5 POINTS	5	SECTION 19 – GLOSSARY – MAX 5 POINTS	5	
<b>TOTAL</b>		<b>46</b>		
		<b>TOTAL</b>		<b>43</b>
		<b>GRAND TOTAL</b>		<b>89</b>
CERTIFIED (85 POINTS OR ABOVE):				
<input checked="" type="radio"/> YES		<input type="radio"/> NO		
EVALUATOR COMMENTS:				
<p><u>Prudence</u> - Suggest adding the following language “and will adhere to the guidance provided by the prudent investor rule” at the end of the first sentence.</p> <p><u>Delegation of Authority</u> – Suggest moving the second paragraph before the first paragraph to make it clear from the on-set that the City Council is responsible for the investment of the City’s funds. Also, suggest adding “The City Council is responsible for the investment of City of Laguna Woods’ funds”.</p> <p><u>Ethics and Conflicts of Interest</u> – Suggest adding “Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business to the City Council. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio.</p> <p><u>Authorized Dealers and Institutions</u> – Suggest stating the Broker-Dealers must be in good standing with the California Department of Securities, the Securities and Exchange Commission, the Financial Industry Regulatory Authority (FINRA).</p> <p><u>Authorized &amp; Suitable Investments</u> – Suggest adding “Credit criteria and maximum percentages listed in this section are calculated at the time the security is purchased”.</p> <p><u>Diversification</u> – Consider adding “and investing in securities with varying maturities” at the end of the paragraph.</p> <p><u>Maximum Maturities</u> – Although the table included under Authorized Investments has “Maximum Maturity”, a sentence should be added to explicitly state “No investments may be acquired that exceed five (5) years.</p> <p><u>Performing Standards</u> – I was unable to locate this requirement. State investment strategy and benchmark used in order to determine whether market yields are achieved.</p>				



# CMTA Investment Policy Scorecard

NAME OF ENTITY:				
City of Laguna Woods				
EVALUATOR:				
Shaun Farrell				
SECTION 2 – SCOPE – MAX 5 POINTS	5	SECTION 11 – COLLATERALIZATION – MAX 5 POINTS	5	
SECTION 3 – PRUDENCE – MAX 5 POINTS	5	SECTION 12 – SAFEKEEPING AND CUSTODY – MAX 5 POINTS	5	
SECTION 4 – OBJECTIVE – MAX 5 POINTS	5	SECTION 13 – DIVERSIFICATION – MAX 5 POINTS	5	
SECTION 5 – DELEGATION OF AUTHORITY – MAX 5 POINTS	5	SECTION 14 – MAXIMUM MATURITIES – MAX 5 POINTS	3	
SECTION 6 – ETHICS AND CONFLICTS OF INTEREST – MAX 5 POINTS	5	SECTION 15 – INTERNAL CONTROLS – MAX 5 POINTS	5	
SECTION 7 – AUTHORIZED DEALERS & INSTITUTIONS – MAX 5 POINTS	5	SECTION 16 – PERFORMING STANDARDS – MAX 5 POINTS	0	
SECTION 8 – AUTHORIZED & SUITABLE INVESTMENTS – MAX 10 POINTS	8	SECTION 17 – REPORTING – MAX 10 POINTS	10	
SECTION 9 – REVIEW OF INVESTMENT PORTFOLIO – MAX 5 POINTS	5	SECTION 18 – INVESTMENT POLICY ADOPTION – MAX 5 POINTS	5	
SECTION 10 – INVESTMENT POOLS/MUTUAL FUNDS – MAX 5 POINTS	5	SECTION 19 – GLOSSARY – MAX 5 POINTS	5	
<b>TOTAL</b>		<b>48</b>		
		<b>TOTAL</b>		<b>43</b>
			<b>GRAND TOTAL</b>	<b>91</b>
CERTIFIED (85 POINTS OR ABOVE):				
<input checked="" type="radio"/> YES		<input type="radio"/> NO		
EVALUATOR COMMENTS:				
<p>Section 8 – You may wish to reconsider under the US Agency Obligation a change to the 20% of a single issuer. I say this this because recently only FHLB was the only issuer. FHLMC and FNMA have not been issuing much debt recently.</p> <p>Section 14 – I realize that the maximum maturities are listed in the investment chart, but I would recommend a separate paragraph with a general statement that no investment shall be over 5 years unless Council approval.</p> <p>Section 16 – There is no section. It needs to be added. A good benchmark would state something like this:</p> <p style="padding-left: 40px;">“The investment portfolio shall be designed with the objective of obtaining a rate of return throughout budgetary and economic cycles, commensurate with investment risk constraints and cash flow needs.</p> <p style="padding-left: 40px;">The City’s basic investment strategy is to buy and hold investments until maturity However, securities may be sold due to adverse changes in credit risk or due to unexpected cash flow needs.</p> <p style="padding-left: 40px;">Under normal circumstances and with consideration of the City’s cash flow, an appropriate benchmark to determine whether market yields are being achieved is the 24-month moving average of the yield from the 2 year Treasury Note.</p>				



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**CITY OF LAGUNA WOODS  
ADMINISTRATIVE POLICY 2.2**

**INVESTMENT OF FINANCIAL ASSETS**

**2.2.01. Statement of Purpose.**

This Administrative Policy is intended to assist the City of Laguna Woods with the investment of the City's financial assets in a manner that ensures adequate safety and liquidity, while maximizing yield (return) and complying with the requirements of California Government Code sections 53600 and 53635 et seq.

**2.2.02. Scope.**

This Administrative Policy generally applies to all financial assets and investment activities of the City. Such funds are accounted for, or disclosed, in annual audited financial statements and include the General Fund, Special Revenue Funds, and the Capital Projects Fund. Funds belonging to the Laguna Woods Civic Support Fund and funds invested separately with independent fiduciaries, including funds held and managed by the California Public Employees' Retirement System (CalPERS) for the purpose of funding employee retirement obligations and other post-employment benefits (OPEB) are exempt from this Administrative Policy.

**2.2.03. Objectives.**

The objectives of the City's investment activities, in priority order, shall be:

1. **Safety** – Safety of principal shall be the foremost objective. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall investment portfolio and the mitigation of credit risk and interest rate risk. This Administrative Policy recognizes that market conditions may warrant the sale of individual securities that would incur market losses in order to protect from further capital losses. The intent of this Administrative Policy is to ensure that capital losses are minimized on a portfolio level rather than on each transaction. To attain the safety objective, diversification of investments among a variety of securities with independent returns and institutions is required.
2. **Liquidity** – The investment portfolio shall remain sufficiently liquid (i.e., capable of being converted to cash quickly) in order to enable the City to meet all reasonably anticipated cash demands and operational requirements and to

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maintain compliance with all applicable indenture agreements. Since unusual or unanticipated cash demands and operational requirements may occur from time-to-time, the portfolio shall primarily consist of investments in securities with active secondary and resale markets.

3. Yield (Return) – The investment portfolio shall be designed in a manner that seeks to attain the highest rate of return, consistent with established safety and liquidity objectives. While it is acknowledged and understood that occasional measurement losses may occur, the rate of return on the investment portfolio should be designed to attain a market rate of return throughout budgetary and economic cycles for similar investments.

**2.2.04. Delegation of Authority.**

*City Treasurer*

In accordance with Government Code Section 53607, the City Council delegates investment authority its statutory authority to invest or to reinvest City funds, or to sell or exchange securities so purchased, for a one-year period to the City Treasurer. Such delegation of authority is subject to annual review and renewal by the City Council, as well as revocation at the City Council’s discretion. Adoption of this Administrative Policy shall constitute renewal of such delegation for an additional one-year period beginning at the date of adoption.

**Commented [CM1]:** The paragraph has been moved and modified to be responsive to the Rexroad CMTA Investment Policy Scorecard.

No person other than the City Treasurer or Acting City Treasurer (hereafter referred to jointly as the “City Treasurer”) shall engage in an investment transaction using the City’s financial assets. The City Treasurer shall additionally be responsible for all investment transactions undertaken and shall establish and maintain a system of internal controls to regulate all investing activities.

~~In accordance with Government Code Section 53607, the City Council delegates investment authority for a one-year period to the City Treasurer. Such delegation of authority is subject to annual review and renewal by the City Council, as well as revocation at the City Council’s discretion. Adoption of this Administrative Policy shall constitute renewal of such delegation for an additional one-year period.~~

Pursuant to Laguna Woods Municipal Code Section 2.10.010, the City Treasurer is appointed by, and reports to, the City Manager. The City Manager may serve as, or appoint, an Acting City Treasurer at any time during the absence of a permanent

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City Treasurer. During his/her/their appointment, the Acting City Treasurer shall have all of the powers and duties of the City Treasurer.

The City Treasurer and City Manager (with respect to his/her/their role appointing and supervising the City Treasurer, and participating in investment decisions) shall be relieved of personal responsibility for an individual investment's performance or losses, market price changes, and the performance of or losses incurred by the overall portfolio provided that (1) actions were undertaken in accordance with this Administrative Policy and applicable federal and state law, (2) significant deviations from expectations were reported to the City Council in a timely manner, and (3) appropriate action was taken to mitigate future adverse developments.

### *Investment Policy Review Committee of the City Council*

The Investment Policy Review Committee shall be responsible for conducting at least biannual reviews of the adequacy and effectiveness of this Administrative Policy and preparing related recommendations for City Council consideration.

The City Council shall appoint two of its members to serve on the Investment Policy Review Committee for terms two calendar years in length, commencing on January 1 of each odd-numbered year. The City Council reserves the right to remove or replace any member of the Investment Policy Review Committee, with or without cause, following a publicly noticed vote of a majority of the quorum of City Councilmembers present at the time.

The Investment Policy Review Committee shall be considered a standing committee, subject to all applicable provisions of the Ralph M. Brown Act.

### **2.2.05. Public Trust.**

The City Council, City Manager, City Treasurer, and all individuals authorized to participate in investment decisions on behalf of the City shall act as custodians of the public trust and recognize that the investment portfolio is subject to public review and evaluation. The City's overall approach to investment shall be designed and managed with a degree of professionalism that is worthy of the public trust and will avoid any transactions that might impair public confidence.

### **2.2.06. Prudence.**

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The City Council, City Manager, City Treasurer, and all individuals authorized to ~~participate in~~~~make~~ investment decisions on behalf of the City, are considered to be trustees and, therefore, fiduciaries ~~subject who shall adhere~~ to the prudent investor standard. The prudent investor standard is summarized in Government Code Section 53600.3, as follows:

**Commented [CM2]:** This portion of this sentence has been modified to be responsive to the Rexroad CMTA Investment Policy Scorecard.

*All governing bodies of local agencies or persons authorized to make investment decisions on behalf of those local agencies investing public funds pursuant to this chapter are trustees and therefore fiduciaries subject to the prudent investor standard. When investing, reinvesting, purchasing, acquiring, exchanging, selling, or managing public funds, a trustee shall act with care, skill, prudence, and diligence under the circumstances then prevailing, including, but not limited to, the general economic conditions and the anticipated needs of the agency, that a prudent person acting in a like capacity and familiarity with those matters would use in the conduct of funds of a like character and with like aims, to safeguard the principal and maintain the liquidity needs of the agency. Within the limitations of this section and considering individual investments as part of an overall strategy, investments may be acquired as authorized by law.*

### **2.2.07. Ethics and Conflicts of Interest.**

As set forth in the City's Conflict of Interest Policy, and as otherwise required by the Political Reform Act and Fair Political Practices Commission, public officials who manage public investments are required to file economic interest disclosures.

In addition to federal, state and local statutes relating to conflicts of interest, the City Council, City Manager, City Treasurer, and all individuals authorized to ~~participate in~~~~make~~ investment decisions on behalf of the City shall refrain from personal business association or activity that conflicts with proper execution of this Administrative Policy, or which could impair their ability to make impartial investment decisions.

### **2.2.08. Internal Controls and Routine External Review.**

The City Treasurer shall develop, implement, and maintain a system of internal controls designed to ensure the effectiveness and efficiency of investment activities, compliance with applicable laws and regulations, and the reliability of financial

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reporting. Such internal controls shall seek to prevent the loss of public funds due to fraud, error, misrepresentation, and unanticipated market changes.

As a part of their annual review of internal controls, the City’s independent, external auditors shall review internal controls related to investment activities.

**2.2.09. Authorized Financial Dealers, Depositories, and Institutions.**

In accordance with Government Code Section 53601.5, investments shall either be purchased (1) directly from the issuer, (2) from an institution licensed by the State of California as a Broker-Dealer, as defined in Corporations Code Section 25004, (3) from a member of a federally regulated securities exchange, (4) from a national or state-chartered bank, from a savings association or federal association, as defined by Financial Code Section 5102, or (5) from a brokerage firm designated as a primary government dealer by the Federal Reserve Bank. In addition, investments shall only be purchased from entities or deposits made in qualified public depositories, as established by state law, with full knowledge of applicable state law, ~~and~~ at least five years’ experience providing similar services to California municipalities, and in good standing with the Financial Industry Regulatory Authority, Securities and Exchange Commission, and California Department of Securities.

**Commented [CM3]:** This sentence has been modified to be responsive to the Rexroad CMTA Investment Policy Scorecard.

The selection of financial dealers, depositories, and institutions shall follow a periodic competitive procurement process (e.g., requests for proposals or requests for qualifications) and be subject to ultimate approval of the City Council or City Manager in accordance with established purchasing regulations and policies. The nature of the competitive procurement process, frequency thereof, and submittals required, shall be designed and determined by the City Treasurer.

On an annual basis, the City Treasurer shall send a copy of the current version of this Administrative Policy to all financial dealers, depositories, and institutions approved to do business with the City. Receipt of this Administrative Policy shall be considered confirmation that the parties to whom they were distributed understand the City’s authorized investment types and requirements thereof.

**2.2.10. Authorized Investments.**

~~In accordance with the requirements set forth in this Administrative Policy and in Investments are governed by~~ Government Code sections 53601, 53601.6, 53601.8, 53635, 53635.2, 53638, and 53684, and further limited by the provisions of this

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Administrative Policy. The following types of investments listed in the table below are authorized and shall be invested subject to the limits and requirements set forth herein: therein. Credit criteria and maximum percentages listed in the table below are calculated at the time the investment is purchased.

**Commented [CM4]:** This sentence has been added to be responsive to the Rexroad CMTA Investment Policy Scorecard.

Type of Investment	Maximum <del>Amount</del> Percent of Portfolio Investment	Maximum Amount of Individual Investment	Minimum Credit Quality and Requirements	Maximum Maturity*
Federal Deposit Insurance Corporation (FDIC) Insured Accounts	100%	-	-	N/A
Bankers' Acceptances	20% (no more than 5% with one bank)	-	-	180 days
Commercial Paper	15% (no more than 10% of a single issuer)	-	Standard & Poor's: AAA or Moody's: Aaa	270 days
Local Government Investment Pools	90%	-	See Section 2.2.11	N/A
Joint Powers Authority Pools	90%	-	Must retain an investment advisor who is registered with the Securities and Exchange Commission (or exempt from registration), has assets under management in excess of \$500 million, and has at least five years' experience investing in instruments authorized by Government Code Section 53601, subdivisions (a) to (o)	N/A
Money Market Mutual Funds	10%	-	Standard & Poor's AAA or Moody's Aaa; and Must retain an investment advisor registered with the Securities and Exchange Commission (or exempt from registration) has assets under management in excess of \$500 million, and has at least five years' experience investing in	N/A

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Type of Investment	Maximum <del>Amount</del> Percent of Portfolio Investment	Maximum Amount of Individual Investment	Minimum Credit Quality and Requirements	Maximum Maturity*
			money market instruments	
Certificates of Deposit (Negotiable and Non-Negotiable)	30% (no more than 10% with one bank or issuer)	\$250,000	Issued by a nationally or state-chartered bank, or state or federal savings and loan association, as defined by California Financial Code Section 5102, and fully insured by the FDIC or collateralized in accordance with Section 2.2.15	5 years
Repurchase Agreements	10% (no more than 20% of a single issuer)	-	Collateralized in accordance with Section 2.2.15	30 days
United States Treasury Obligations	90% of overall portfolio for any one investment type (no more than 20% of a single issuer)	-	Explicit full faith and credit guarantee of the United States Government	5 years
United States Agency Obligations		-	Implied full faith and credit guarantee of the United States Government	5 years
State of California and Other States-issued Obligations	20% of overall portfolio for any one investment type (no more than 5% of a single issuer)	-	-	3 years
California Local Government-issued Municipal Obligations		-	-	3 years
Medium-Term Notes	20%	-	Nationally Recognized Statistical Ratings Organization Rating: "A" rating category or its equivalent	5 years

**Commented [CM5]:** The Farrell and Phillips CMTA Investment Policy Scorecards suggest reviewing this "no more than 20% of a single issuer" limitation.

\* No investment shall be made with a maturity date more than five years from the date of purchase.

**Commented [CM6]:** This note has been added to be responsive to the Farrell and Rexroad CMTA Investment Policy Scorecards.

**2.2.11. Local Government Investment Pools.**

While local government investment pools generally provide significant safety and liquidity, the City Treasurer shall complete a thorough investigation prior to making

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any such investment and consider the same during the monthly compliance review required by Section 2.2.13. Due diligence in investigations shall generally include a review of written statements of investment policies, objectives, fees schedules, and reporting schedules, as well as issues related to (1) eligible investors and securities, (2) the permitted frequencies and sizes of deposits and withdrawals, (3) security safeguards, including settlement processes, (4) the frequency with which securities are priced and the program audited, (5) the treatment of gains and losses, including interest calculations and distribution, (6) whether and, if so, how reserves, retained earnings, and similar funds are utilized by the investment pool, and (7) whether the investment pool is eligible for and, if so, accepts bond proceeds. In addition, only local government investment pools with at least five years' experience providing similar services to other California municipalities may be utilized. Similar due diligence and investigative procedures shall be performed prior to investing in any other pooled investment funds, such as money market mutual funds.

### **2.2.12. Prohibited Investments.**

Notwithstanding those types of investments that are otherwise prohibited by law or this Administrative Policy, any investment not specifically listed in Section 2.2.10, as well as financial derivatives (e.g., inverse floaters, range notes, interest only strips derived from a pool of mortgages, and securities that could result in a zero-interest accrual if held to maturity) and foreign investments (e.g., indices and currencies) are prohibited.

### **2.2.13. Monthly Internal Compliance Review of Investment Portfolio.**

Investments shall be in compliance with the ratings and other requirements set forth in this Administrative Policy at the time of purchase. It is acknowledged and understood that some investments may not fully comply with the same following purchase. The City Treasurer shall review the overall investment portfolio on a monthly basis and identify any investments that no longer comply. Non-compliant investments shall be reported to the City Council, City Manager, and City Attorney within 10 business days of discovery and corrected as soon as practical.

### **2.2.14. Safekeeping and Custody.**

All investments shall be registered in the name of the City and all interest, principal payments, and withdrawals shall indicate the City as the sole payee.

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All investments, with the exception of Federal Deposit Insurance Corporation (FDIC) Insured Accounts, Local Government Investment Pools, and Money Market Funds shall be held by a third-party custodian designated by the City Treasurer and evidenced by custodial agreements or safekeeping receipts. Third-party custodians shall comply with the requirements set forth in Section 2.2.09.

All security transactions, where applicable, shall use a Delivery-versus-Payment (DVP) settlement procedure with the City’s payment due at the time of delivery, which ensures that securities are deposited with the third-party custodian prior to the release of funds.

**2.2.15. Collateralization.**

Collateral for bank deposits and certificates of deposit shall be 110% of the market value of principal and accrued interest. Collateral can be either United States Treasury securities or United States Agency securities.

Collateral for repurchase agreements shall be 102% of the market value of principal and accrued interest. Collateral can be either United States Treasury securities or United States Agency securities. The City Treasurer is authorized to grant the right of collateral substitution for repurchase agreements.

All collateral shall be held by an independent third party with whom the City has a current custodial agreement or master repurchase agreement. Evidence of ownership (safekeeping receipt) must be supplied to the City and retained.

**2.2.16. Diversification.**

The overall investment portfolio shall be diversified to avoid incurring unreasonable and avoidable risks associated with concentrating investments in ~~specific-unvaried~~ investment types, maturity segments, or ~~individual~~ financial ~~depositories and~~ institutions. In a diversified portfolio, ~~it is acknowledged and understood that~~ occasional measurement losses may occur. Such losses shall be considered within the overall portfolio’s investment return. ~~Diversification also requires investments to be spread among varying security types and institutions.~~

**Commented [CM7]:** This sentence has been deleted upon review of the Rexroad CMTA Investment Policy Scorecard. It is duplicative of the first sentence in this paragraph.

**2.2.17 Performing Standards.**

The City's investment strategy is generally passive (hold to maturity). Given this strategy, the basis used to determine whether market yields are being achieved shall be to compare the average City portfolio yield to XX.

**Commented [CM8]:** This section has been added to be responsive to the Farrell, Phillips, and Rexroad CMTA Investment Policy Scorecards. Further discussion is required.

**2.2.1718. Reporting.**

The City Treasurer shall prepare and submit a monthly investment report to the City Council. The report shall include a summary of all investment transactions for the preceding month, as required by Government Code Section 53607, as well as similar information that would be required by Government Code Section 53646(b) if the City prepared quarterly investment reports, to the extent that such information is available.

The report shall contain, at a minimum, the following information that is subject to this Administrative Policy: the type of investment, issuer, date of maturity, par value and costs of each investment, market value, and a description of any investments, including loans and security lending programs, that are under the management of contracted parties. For funds in local government investment pools, the report shall also include a current market value as of the date of the report and the source of that same valuation. The report shall also comply with Government Accounting Standard Board (GASB) Statement No. 40 and include the following:

- A. Certification that all investment actions executed since the last report have been made in full compliance with this Administrative Policy; and
- B. Certification that the City is able to meet all cash flow needs which might reasonably be anticipated for the next 12 months.

**2.2.1819. Annual City Council Review and Adoption of this Administrative Policy.**

This Administrative Policy shall be reviewed, modified as necessary, and adopted, at least annually, to ensure its consistency with the objectives set forth in Section 2.2.03 and applicable law. The Administrative Policy shall be adopted by resolution of the City Council at a duly noticed public meeting. Such annual review shall be in addition to the reviews conducted by the Investment Policy Review Committee as described in Section 2.2.04.

**2.2.1920. Relationship to Federal and State Laws.**

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Where federal or state laws are more restrictive than or contradict this Administrative Policy, such laws shall take precedence. Where this Administrative Policy is more restrictive than federal or state laws, this Administrative Policy shall take precedence. The City Treasurer shall advise the Investment Policy Review Committee of any contradictions of federal or state law for consideration during its reviews conducted as described in Section 2.2.04.

**2.2.2021. Attachments.**

Attachment A, “Glossary of Terms and Acronyms,” is incorporated by reference.

Attachment B, “California Municipal Treasurers Association Investment Policy Certification”

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City Council Adoption: ~~September 21, 2022~~ March 22 TBD, 2023

**Attachment A, “Glossary of Terms and Acronyms”**

*This Glossary of Terms and Acronyms contains common investment terminology to provide users with a better understanding of basic investment terms. It is intended to be used as a basic reference only, is not intended to be all inclusive, and should not be treated as a substitute for professional counsel or analysis.*

**ACCRUED INTEREST**: Coupon interest accumulated on a bond or note since the last interest payment or, for a new issue, from the dated date to the date of delivery.

**BANK DEPOSITS**: Deposits in banks or other depository institutions that may be in the form of demand accounts (checking) or investments in accounts that have a fixed term and negotiated rate of interest.

**BANKERS’ ACCEPTANCE**: A draft or bill of exchange accepted by a bank or trust company. The accepting institution, as well as the issuer, guarantees payment of the bill.

**BOND PROCEEDS**: The money paid to the issuer by the purchaser or underwriter of a new issue of municipal securities. These moneys are used to finance the project or purpose for which the securities were issued and to pay certain costs of issuance as may be provided in the bond contract.

**BONDS**: A debt obligation of a firm or public entity. A bond represents the agreement to repay the debt in principal and, typically, in interest on the principal.

**BROKER**: A person or firm that acts as an intermediary by purchasing and selling securities for others rather than for its own account.

**CASH FLOW**: A comparison of cash receipts (revenues) to required payments (debt service, operating expenses, etc.).

**CERTIFICATE OF DEPOSIT**: A short-term, secured deposit in a financial institution that usually returns principal and interest to the lender at the end of the loan period. Certificates of Deposit (CDs) differ in terms of collateralization and marketability. CDs appropriate to public agency investing include:

*Negotiable Certificates of Deposit* – Generally, short-term debt instruments that pay interest and is issued by a bank, savings or federal association, state or federal credit union, or state-licensed branch of a foreign bank. The majority of negotiable CDs

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mature within six months while the average maturity is two weeks. Negotiable CDs are traded in a secondary market and are payable upon order to the bearer or initial depositor (investor). Negotiable CDs are insured by the FDIC up to \$250,000, but they are not collateralized beyond that amount.

*Non-Negotiable Certificates of Deposit* – CDs that carry a penalty if redeemed prior to maturity. A secondary market does exist for non-negotiable CDs, but redemption includes a transaction cost that reduces returns to the investor. Non-negotiable CDs issued by banks and savings and loans are insured by the FDIC up to the amount of \$250,000, including principal and interest. Amounts deposited above this amount may be secured with other forms of collateral through an agreement between the investor and the issuer. Collateral may include other securities, including treasuries or agency securities (e.g., issued by the Federal National Mortgage Association).

COLLATERALIZATION OF DEPOSITS: A process by which a bank or other financial institution pledges securities or other deposits for the purpose of securing the repayment of deposited funds.

COMMERCIAL PAPER: An unsecured short-term promissory note issued by corporations or municipalities, with maturities ranging from two to 270 days.

COUNTY POOLED INVESTMENT FUNDS: The aggregate of all funds from public agencies placed in the custody of the county treasurer or chief finance officer for investment and reinvestment.

COUPON: The annual rate of interest that a bond's issuer promises to pay the bondholder in the bond's face value; a certificate attached to a bond evidencing interest due on a payment date.

CREDIT RATING: The credit worthiness of an investment. Credit ratings are issued by Nationally Recognized Statistical Rating Organizations (NRSROs) registered with the Securities and Exchange Commission. Three highly recognized NRSROs are Standard and Poor's, Moody's, and Fitch. The organizations use a primary letter designation (numbers or symbols may follow the letter designation) to indicate the quality of an investment. As an example, short-term ratings by Standard and Poor's of A-1+ and Moody's of P-1 indicate a prime or high-grade quality investment. Long-term prime or high-grade quality investments would be rated AAA or Aaa by Standard and Poor's and Moody's, respectively. Rates beginning with letters B or C would typically indicate an investment of speculative and higher risk quality.

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CREDIT RISK: The chance that an issuer will be unable to make scheduled payments of interest and principal on an outstanding obligation. Another concern for investors is that the market's perception of an issuer/borrower's credit will cause the market value of a security to fall, even if default is not expected.

CUSTODIAN: A bank or other financial institution that keeps custody of stock certificates and other assets.

DEALER: Someone who acts as a principal in all transactions, including underwriting, buying, and selling securities, including from his/her/their own account.

DELIVERY-VERSUS-PAYMENT (DVP): The payment of cash for securities as they are delivered and accepted for settlement.

DERIVATIVE: Securities that are based on, or derived from, some underlying asset, reference date, or index.

DISCOUNT: The difference between the par value of a security and the cost of the security, when the cost is below par. Investors purchase securities at a discount when return to the investor (yield) is higher than the stated coupon (interest rate) on the investment.

DISCOUNT RATE: The interest rate used in discounted cash flow analysis to determine the present value of future cash flows. The discount rate in discounted cash flow analysis takes into account not just the time value of money, but also the risk or uncertainty of future cash flows; the greater the uncertainty of future cash flows, the higher the discount rate.

DIVERSIFICATION: The allocation of different types of assets in a portfolio to mitigate risks and improve overall portfolio performance.

FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC): A federal agency that insures bank deposits, currently up to \$250,000 per entity.

FIDUCIARY: An individual who holds something in trust for another and bears liability for its safekeeping.

GOVERNMENT ACCOUNTING STANDARDS BOARD (GASB): A standard-setting body, associated with the Financial Accounting Foundation, which prescribes

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standard accounting practices for governmental units.

INDEX: An indicator that is published on a periodic basis that shows the estimated price and/or yield levels for various groups of securities.

INTEREST: The amount a borrower pays to a lender for the use of his/her/their money.

INTEREST RATE RISK: The risk that an investment's value will change due to a change in the absolute level of interest rates, spread between two rates, shape of the yield curve, or any other interest rate relationship.

JOINT POWERS AUTHORITY POOLS: Investment pools involving the joint exercise of common investment powers between two or more public agencies with shares of beneficial interest issued pursuant to Government Code Section 6509.7.

LIQUIDITY: The measure of the ability to convert an instrument to cash on a given date at full face or par value.

LOCAL AGENCY INVESTMENT FUND (LAIF): A voluntary investment fund open to government entities and certain non-profit organizations in California that is managed by the State Treasurer's Office.

LOCAL GOVERNMENT INVESTMENT POOLS: Investment pools that include the Local Agency Investment Fund (LAIF) and County Pooled Investment Funds. These funds are not subject to the same SEC rules applicable to money market mutual funds. For this Administrative Policy, Joint Powers Authority Pools are not considered "Local Government Investment Pools."

MARKET VALUE: The price at which a security is trading and presumably could be purchased or sold at a particular point in time.

MATURITY: The date on which the principal or stated value of an investment becomes due and payable.

MEDIUM-TERM NOTES: Corporate or depository institution debt securities meeting certain minimum quality standards (as specified in Government Code Section 53601) with a maximum remaining maturity of five years or less, issued by (a) corporations organized and operating within the United States or (b) depository institutions licensed by the United States or any state and operating within the United

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States. Instruments separately defined in, or authorized by, this Administrative Policy are not considered “Medium-Term Notes.”

MONEY MARKET MUTUAL FUNDS (MMFs): Mutual funds that invest exclusively in short-term money market instruments. MMFs seek the preservation of capital as a primary goal while maintaining a high degree of liquidity and providing income representative of the market for short term investments.

MORTGAGE-BACKED SECURITIES (MBS): Securities created when a mortgagee or a purchaser of residential real estate mortgages creates a pool of mortgages and markets undivided interests or participations in the pool. MBS owners receive a pro-rata share of the interest and principal cash flows (net of fees) that are “passed through” from the pool of mortgages. MBS are complex securities whose cash flow is determined by the characteristics of the mortgages that are pooled together. Investors in MBS face prepayment risk associated with the option of the underlying mortgagors to pre-pay or payoff their mortgage. Most MBS are issued and/or guaranteed by federal agencies and instrumentalities (e.g., Government National Mortgage Association (GNMA), Federal National Mortgage Association (FNMA), and Federal Home Loan Mortgage Corporation (FHLMC)).

MUNICIPAL NOTES, BONDS, AND OTHER OBLIGATIONS: Obligations issued by state and local governments to finance capital and operating expenses.

MUTUAL FUNDS: An investment company that pools money and can invest in a variety of securities, including fixed-income securities and money market instruments.

NATIONALLY RECOGNIZED STATISTICAL RATINGS ORGANIZATION (NRSRO): A credit rating agency registered as a “Nationally Recognized Statistical Ratings Organization” with the Securities and Exchange Commission, consistent with the Credit Rating Agency Reform Act, the Dodd-Frank Wall Street Reform and Consumer Protection Act, and other applicable legislation and rulemaking, as may change from time-to-time.

NEW ISSUE: Securities sold during the initial distribution of an issue in a primary offering by the underwriter or underwriting syndicate.

NOTE: A written promise to pay a specified amount to a certain entity on demand or on a specified date. Usually bearing a short-term maturity of a year or less (though longer maturities are issued—see “Medium-Term Notes”).

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**PAR VALUE:** The principal amount of a note or bond which must be paid at maturity. Par, also referred to as the “face amount” of a security, is the principal value stated on the face of the security. A par bond is one sold at a price of 100 percent of its principal amount.

**PORTFOLIO:** Combined holding of more than one stock, bond, commodity, real estate investment, cash equivalent, or other asset. The purpose of a portfolio is to reduce risk by diversification.

**PREMIUM:** The difference between the par value of a security and the cost of the security, when the cost is above par. Investors pay a premium to purchase a security when the return to the investor (yield) is lower than the stated coupon (interest rate) on the investment.

**PRICE:** The amount of monetary consideration required by a willing seller and a willing buyer to sell an investment on a particular date.

**PRINCIPAL:** The face value or par value of a debt instrument, or the amount of capital invested in a given security.

**PRUDENT INVESTOR STANDARD:** A standard of conduct where a person acts with care, skill, prudence, and diligence when investing, reinvesting, purchasing, acquiring, exchanging, selling, and managing funds. The test of whether the standard is being met is if a prudent person acting in such a situation would engage in similar conduct to ensure that investments safeguard principal and maintain liquidity.

**REPURCHASE AGREEMENTS:** An agreement of one party (for example, a financial institution) to sell securities to a second party (such as a local agency) and simultaneous agreement by the first party to repurchase the securities at a specified price from the second party on demand or at a specified date.

**RISK:** The uncertainty of maintaining the principal or interest associated with an investment due to a variety of factors.

**SAFEKEEPING SERVICE:** Offers storage and protection of assets provided by an institution serving as an agent.

**SAFETY:** In the context of investing public funds, safety relates to preserving the principal of an investment in an investment portfolio; local agencies address the concerns of safety by controlling exposure to risks.

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SECURITIES AND EXCHANGE COMMISSION (SEC): The federal agency responsible for supervising and regulating the securities industry.

TRUSTEE OR TRUST COMPANY: A financial institution with powers to act in a fiduciary capacity for the benefit of the bondholders in enforcing the terms of the bond contract.

UNDERWRITER: A dealer that purchases a new issue of municipal securities for resale.

UNITED STATES AGENCY OBLIGATIONS: Federal agency or United States government-sponsored enterprise obligations, participations, or other instruments, including those issued by or fully guaranteed as to principal and interest by federal agencies or United States government-sponsored enterprises, including federal agency mortgage-backed securities. Types of instruments may include mortgage-backed securities from the Federal National Mortgage Association (FNMA) including Fannie Mae and Freddie Mac securities.

UNITED STATES TREASURY OBLIGATIONS: Debt obligations of the United States government sold by the Treasury Department in the forms of bills, notes, and bonds. Bills are short-term obligations that mature in one year or less and are sold at a discount. Notes are obligations that mature between one year and 10 years. Bonds are long-term obligations that generally mature in 10 years or more.

YIELD: The current rate of return on an investment security generally expressed as a percentage of the securities current price.

YIELD CURVE: A graphic representation that shows the relationship at a given point in time between yields and maturity for bonds that are identical in every way except maturity.

**Attachment B, “California Municipal Treasurers Association Investment Policy Certification”**

The City’s Investment of Financial Assets policy, as adopted by the City Council on April 4, 2022, was certified by the California Municipal Treasurers Association (CMTA) on June 27, 2022.

**California Municipal Treasurers Association**



*Investment Policy Certification*



Issued on 06/27/2022

**City of Laguna Woods**

The California Municipal Treasurers Association certifies that the investment policy of the City of Laguna Woods complies with the current State statutes governing the investment practices of local government entities located within the State of California.



  
President

06/27/2022  
Date

Since receiving certification, the City’s modifications of the Investment of Financial Assets policy have been limited to updating this Attachment B.

**Commented [CM9]:** This paragraph would be updated to reflect modifications recommended to the City Council.