

SACRAMENTO COUNTY TREASURY OVERSIGHT COMMITTEE

Regular Meeting — Friday, February 21, 2020 / 9:00 a.m. 700 H Street, Hearing Room One, Room 1487 Sacramento, California 95814

AGENDA

ITEM SUBJECT

- 1. Call To Order And Introductions.
- 2. Comments From The Public.
- 3. Approval Of November 15, 2019, Meeting Minutes.
- 4. Discussion And Action On The Internal Audit Of Non-Pooled Investment Funds For The Quarter Ended December 31, 2019.
- 5. Presentation Of The Sacramento County Annual Investment Policy Of The Pooled Investment Fund For Calendar Year 2020.
- 6. Legislative Update.
- 7. Member Update.
- 8. Discussion And Action On The Non-Pooled Funds Portfolio Report For The Quarter Ended December 31, 2019.
- 9. Discussion And Action On The Quarterly Report Of The Pooled Investment Fund For The Quarter Ended December 31, 2019, And Compliance With Investment Policy.
- 10. Overview Of Pooled Investment Fund Statistics From Various Jurisdictions For December 2019.
- 11. Community Reinvestment Act Program.
- 12. Future Presentations To The Treasury Oversight Committee.
- 13. FPPC Form 700 Reminder.
- 14. Next Meeting Reminder Friday, May 15, 2020.
- 15. Adjournment.

ITEM 1

CALL TO ORDER AND INTRODUCTIONS.

NO WRITTEN REPORT

Sacramento County Treasury Oversight Committee Meeting February 21, 2020

ITEM 2

COMMENTS FROM THE PUBLIC.

NO WRITTEN REPORT

Sacramento County Treasury Oversight Committee Meeting February 21, 2020 APPROVAL OF NOVEMBER 15, 2019, MEETING MINUTES.



SACRAMENTO COUNTY TREASURY OVERSIGHT COMMITTEE

Regular Meeting — Friday, November 15, 2019 / 9:00 a.m.

700 H Street, Hearing Room One, Room 1487 Sacramento, California 95814

MINUTES

- **PRESENT:** Angelica Hernandez, Ben Lamera, Chris Parker, Ronald Seaman, Michael Smith, Amanda Thomas, David Villanueva.
- **ABSENT:** Jeremy Edwards, Mario Rodriguez, Joseph Wilson.
- **STAFF:** Peggy Marti, Alan Matré, Dave Matuskey, Bernard Santo Domingo.
- GUESTS: Regina Gill, Bill Noland.

1. CALL TO ORDER AND INTRODUCTIONS.

Chair Chris Parker called the meeting to order at 9:01 a.m.

2. COMMENTS FROM THE PUBLIC.

There were no comments from the public.

3. APPROVAL OF AUGUST 16, 2019, MEETING MINUTES.

The minutes of the August 16, 2019, meeting were approved as amended on a motion made by Michael Smith, seconded by Amanda Thomas, and carried (6-0).

4. DISCUSSION AND ACTION ON THE INTERNAL AUDIT OF NON-POOLED INVESTMENT FUNDS FOR THE QUARTER ENDED SEPTEMBER 30, 2019.

Alan Matré reported for the quarter ended September 30, 2019, that twelve issues, two of which were new and none of which was external, were reviewed and no instances of noncompliance were found. There was a discussion on whether it is necessary to have audit staff present the internal audit item quarterly. Staff will review the bylaws and report back to the committee at the next meeting.

The Internal Audit Of Non-Pooled Investment Funds For The Quarter ended September 30, 2019, was accepted on a motion made by Ronald Seaman, seconded by Michael Smith, and unanimously carried (7-0).

5. FEDERAL FARM CREDIT BANKS PRESENTATION.

Regina Gill and Bill Noland discussed the operations of the Farm Credit Banks and Farm Credit West and their work with the local agricultural community.

6. DISCUSSION AND ACTION ON THE QUARTERLY REPORT OF THE NON-POOLED FUNDS PORTFOLIO REPORT FOR THE QUARTER ENDED SEPTEMBER 30, 2019.

Bernard Santo Domingo presented the Quarterly Report of the Non-Pooled Funds Portfolio for the Quarter Ended September 30, 2019.

The Non-Pooled Funds Portfolio Reports For The Quarter Ended September 30, 2019, was accepted on a motion made by Amanda Thomas, seconded by Angelica Hernandez, and unanimously carried (7-0).

7. DISCUSSION AND ACTION ON THE QUARTERLY REPORT OF THE POOLED INVESTMENT FUND FOR THE QUARTER ENDED SEPTEMBER 30, 2019, AND COMPLIANCE WITH INVESTMENT POLICY.

Bernard Santo Domingo presented the Quarterly Report Of The Pooled Investment Fund For The Quarter Ended September 30, 2019, and Compliance with Investment Policy. He stated that the Pooled Investment Fund was in compliance with the investment policy and California Government Code.

Bernard Santo Domingo provided his economic commentary. He stated the Fed cut rates to the 1.50%-1.75% range in October and both the Fed forecasts and the market expects one to two more rate cuts in 2020. He noted the yield curve went negative in September, an indicator that the economy is slowing down. He pointed out that 3rd quarter GDP was 1.9% and that consumer spending accounted for almost all of the growth. He expects the rates on the pooled fund to drift moderately lower.

The Quarterly Reports of the Pooled Investment Fund For The Quarter Ended September 30, 2019, were accepted on a motion made by Michael Smith, seconded by Ronald Seaman, and unanimously carried (7-0).

8. OVERVIEW OF POOLED INVESTMENT FUND STATISTICS FROM VARIOUS JURSIDICTION FOR SEPTEMBER 2019.

Bernard Santo Domingo presented the Investment Fund Statistics Questionnaire Results – September 2019, Comparison of Various County Pooled Investment Funds and LAIF – 12-Month Yield Performance as of September 2019, and Overview of Pooled Investment Fund Statistics from Various Jurisdictions – Comparison of Yields and Average Weighted Maturities from December 31, 2018 – September 30, 2019.

9. NEXT MEETING REMINDER.

Chair Chris Parker reminded the committee that the next regular meeting of the Treasury Oversight Committee is scheduled for Friday, February 21, 2020, in the County Administration Center's Hearing Room One, Room 1487.

10. ADJOURNMENT.

The meeting was adjourned at 10:07 a.m.

Respectfully submitted:

Approved:

Dave Matuskey Investment Officer **Chris Parker, Chair** Treasury Oversight Committee

cc: Treasury Oversight Committee Members Department of Finance Staff

DISCUSSION AND ACTION ON THE INTERNAL AUDIT OF NON-POOLED INVESTMENT FUNDS FOR THE QUARTER ENDED DECEMBER 31, 2019.

Sacramento County Treasury Oversight Committee Meeting February 21, 2020 **Department of Finance** Ben Lamera Director



Auditor-Controller Division Joyce Renison Assistant Auditor-Controller

County of Sacramento

Intra-Departmental Memorandum

January 28, 2020

To: Bernard Santo Domingo Chief Investment Officer

Hong Lun (Andy) Yu, CPA From: Audit Manager

Subject: TREASURY OVERSIGHT COMMITTEE – NON-POOLED INVESTMENTS PERFORMANCE AUDIT REPORT FOR THE QUARTER ENDED DECEMBER 31, 2019

Attached for your information is the final performance audit report for the above referenced program.

Thank you.

Attachment

COUNTY OF SACRAMENTO

Treasury Oversight Committee Non-Pooled Investments Performance Audit Report

For the Quarter Ended December 31, 2019

Audit Staff:

Hong Lun (Andy) Yu, CPA Linda Tsang Audit Manager Auditor

COUNTY OF SACRAMENTO TREASURY OVERSIGHT COMMITTEE NON-POOLED INVESTMENTS PERFORMANCE AUDIT REPORT FOR THE QUARTER ENDED DECEMBER 31, 2019

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Sample of Non-Pooled Investments for Quarter Ended December 31, 2019 - Schedule I4



County of Sacramento

January 28, 2020

The Honorable Board of Supervisors and the Sacramento County Treasury Oversight Committee County of Sacramento, California

We have audited the Sacramento County Non-Pooled Investment Fund's (Fund) for the quarter ended December 31, 2019.

Our audit was conducted to verify the Fund's compliance with County of Sacramento, Non-Pooled Investment Policy (Policy) as described below for the quarter ended December 31, 2019, and to verify whether the Department of Finance, Treasury Division (Treasury) Division and Investment Division (Investment) have adequate internal control to ensure the Fund's compliance with the policy.

Non-Pooled Investments primarily consist of investments purchased with proceeds from Mello Roos Bonds (MR), Revenue Bonds (REV), General Obligation Bonds (GO), Assessment District Bonds (AD), Community Facilities District Bonds (CFD), Certificates of Participation Notes (COPs), and Tobacco Securitization Proceeds (TSP). The investment policy for the bonds is set forth in either the bond resolution, the bond indenture or by the bond insurer (governing investment policy document). The investment policy for the Tobacco Securitization Proceed is set forth in the Tobacco Securitization bond resolution and bond indenture.

The majority of the bond investments are limited to those authorized by California Government Code Section 53601 et seq. Any other authorized investments are indicated in the governing investment policy document.

Management is responsible for the design, implementation, and maintenance of effective internal control to ensure compliance with the Policy.

The scope of our audit includes all non-pooled investments for the quarter ended December 31, 2019.

The audit methodology utilized to conduct the performance audit included:

Interview:

- We interviewed various Treasury and Investment staff to gain an understanding of policies, procedures, and processes for ensuring the Fund's compliance with the Policy.

The Honorable Board of Supervisors and the Sacramento County Treasury Oversight Committee January 28, 2020 Page 2 of 3

Document Review:

- We reviewed the organization chart and written documentation to understand the relevant policies, procedures, and processes and to identify any internal control weaknesses, conflicts of interest, and inadequate segregation of duties.

Process Walkthrough:

- We had Treasury and Investment staff walk us step-by-step through processes related to the daily activities of the Fund. We verified whether staff had followed the policies and procedures.

Testing:

- We verified that the SunGard Financial Services, Inc., Advanced Portfolio System II non-pooled investment balances agreed with the custodian statements.
- We randomly selected eleven out of forty-two non-pooled investments based upon outstanding issues at December 31, 2019, including one new issue since quarter ended September 30, 2019 to test for compliance with the Policy. All eleven non-pooled investments selected were internally managed funds. See Schedule I, *Sample of Non-Pooled Investments for Quarter Ended December 31, 2019.* The eleven non-pooled investments selected for testing totaled \$117,248,338, which represents approximately 15% of the total \$760,544,158 internally managed non-pooled investments.
- We inspected the portfolio monitoring report for eleven selected investments and tested for accuracy.
- We verified that investments were made in accordance with the Policy.

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards* except for paragraph 3.56 regarding to our independence as described below paragraph. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

As required by various statutes within the California Government Code, County Auditor-Controllers or Directors of Finance are mandated to perform certain accounting, auditing, and financial reporting functions. These activities, in themselves, necessarily impair *Generally Accepted Government Auditing Standards*' independence standards. Specifically, auditors should not audit their own work or provide non-audit services in situations where the amounts or services involved are significant/material to the subject matter of the audit. The Honorable Board of Supervisors and the Sacramento County Treasury Oversight Committee January 28, 2020 Page 3 of 3

Although the Director of Finance is statutorily obligated to maintain the non-pooled investment in the County Treasury, we believe that the following safeguard and division of responsibility exist. The staff that has the responsibility to perform audits within the Auditor-Controller Division has no other responsibility regarding the internal control or compliance of the Fund, the accounts and records being audited including the approval or posting of financial transactions that would therefore enable the reader of this report to rely on the information contained herein.

Based on our audit, the Fund complied with the Policy for the quarter ended December 31, 2019. Also, Treasury and Investment have adequate internal control to ensure the Fund's compliance with the Policy.

This report is intended solely for the information and use of the Sacramento County Board of Supervisors, those charged with governance, Sacramento County Treasury Oversight Committee, Sacramento County Audit Committee, and Treasury and Investment's management, and should not be used for any other purpose. It is not intended to be, and should not be, used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

Sincerely,

BEN LAMERA DIRECTOR OF FINANCE

By: Hong Lun (Andy) Yu, CPA Audit Manager

COUNTY OF SACRAMENTO SAMPLE OF NON-POOLED INVESTMENTS FOR QUARTER ENDED DECEMBER 31, 2019

	Book Value	
Issue ⁽¹⁾	12/31/19	<u>% of Portfolio</u>
Sac City USD Series 2017 E (GO)	\$ 47,999,351	6 %
Airport System 2009 C&D (REV)	18,012,842	2
Airport System Ref 2018A-C (REV)	17,286,158	2
Sac City USD Series 2019 D (GO)	13,941,783	2
Sac City USD Series 2018F (GO)	10,116,195	1
Elliott Ranch Refunding (MR)	2,874,675	<1
Florin Vineyard CFD No. 1 2018 (MR)	2,406,757	<1
Airport System Refund 2016A (REV)	2,286,543	<1
North Vineyard No. 1 2016 (MR)	2,176,967	<1
Metro Air Park 2007B (MR)	144,732	<1
SRCSD REF 2007 (REV)	2,335	<1
Total Non-Pooled Investments tested (2)	<u>\$ 117,248,338</u>	<u>Approx. 15%</u>

- (1) The selected sample of non-pooled investments for the quarter ended December 31, 2019 was selected based upon outstanding issues at October 1, 2019, plus any untested new issues since quarter ended September 30, 2019. Issues selected were all internally managed non-pooled investments.
- (2) The total amount of non-pooled investments for the quarter ended December 31, 2019 was \$776,419,360 (\$760,544,158 internally managed and \$15,875,202 externally managed).

<u>Fund Type</u> (GO) – General Obligation Bonds (REV) – Revenue Bonds (MR) – Mello Roos Bonds

Indicates new issue

PRESENTATION OF THE SACRAMENTO COUNTY ANNUAL INVESTMENT POLICY OF THE POOLED INVESTMENT FUND FOR CALENDAR YEAR 2020.

Sacramento County Treasury Oversight Committee Meeting February 21, 2020



COUNTY OF SACRAMENTO CALIFORNIA

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For the Agenda of: December 17, 2019

To: Board of Supervisors

Through: Navdeep S. Gill, County Executive

From: Ben Lamera, Director, Department of Finance

Subject: Delegation Of Investment Authority To The Director Of Finance And Approval Of The Annual Investment Policy Of The Pooled Investment Fund For Calendar Year 2020

District(s): All

RECOMMENDED ACTION

Adopt the attached resolution renewing the delegation of authority to the Director of Finance to invest funds in the County Treasury and to sell and exchange securities and approving the Annual Investment Policy of the Pooled Investment Fund for Calendar Year 2020.

BACKGROUND

Government Code Section 53607 allows the Board to annually delegate to the Director of Finance the authority to invest funds in the County Treasury and to sell and exchange securities. The Board serves as a fiduciary unless this authority is delegated. Since 1996, the Board has annually delegated to the Director of Finance the authority to invest funds in the County Treasury and to sell and exchange securities. The Board has also approved the Annual Investment Policy of the Pooled Investment Fund (Investment Policy) every year since 1987.

The changes to the Investment Policy for 2020 are:

1. Section IX. D. – Credit Requirements (Page 5)

The \$10 million limit on investments made through the Community Reinvestment Act Program has been removed to allow more deposits in the program without increasing risk or compromising Investment Policy objectives.

2. Section XII. – Limits on Honoraria, Gifts, and Gratuities (Pages 10-11)

The gift limit was updated to reflect the current Fair Political Practices Commission annual limit of \$500, increased from \$470.

Delegation Of Investment Authority To The Director Of Finance And Approval Of The Annual Investment Policy Of The Pooled Investment Fund For Calendar Year 2020 Page 2

All other changes to the Investment Policy are grammatical corrections or clarifications and do not affect the intent of the policy.

FINANCIAL ANALYSIS

Investment performance and compliance is evaluated quarterly by the Treasury Oversight Committee and annually by external auditors. Monthly and quarterly reports are also provided to the Board.

Attachment(s):

RES – Delegation of Investment Authority and Approval of Investment Policy ATT 1 – 2020 Investment Policy

ATT 2 – 2020 Investment Policy with Track Changes

RESOLUTION NO. 2019-0856

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SACRAMENTO RENEWING THE AUTHORITY OF THE DIRECTOR OF FINANCE TO INVEST FUNDS AND APPROVING THE ANNUAL INVESTMENT POLICY OF THE POOLED INVESTMENT FUND FOR CALENDAR YEAR 2020

WHEREAS, the Board of Supervisors delegated authority to invest funds in the County Treasury to the Director of Finance on December 4, 2018, in accordance with Government Code Sections 27000.1 and 53607; and

WHEREAS, the authority to invest funds in the County Treasury, delegated to the Director of Finance, expires after one year under Government Code Sections 27000.1 and 53607; and

WHEREAS, the Board of Supervisors has reviewed the delegation of authority to the Director of Finance to invest funds in the County Treasury and the Annual Investment Policy of the Pooled Investment Fund for Calendar Year 2020 and finds it to be reasonable and prudent;

NOW, THEREFORE, BE IT RESOLVED that the Board of Supervisors hereby renews the delegation of authority to the Director of Finance to invest funds in the County Treasury and to sell and exchange securities in accordance with the California Government Code and approves the Annual Investment Policy of the Pooled Investment Fund for Calendar Year 2020. On a motion by Supervisor Frost, seconded by Supervisor Serna, the foregoing Resolution was passed and adopted by the Board of Supervisors of the County of Sacramento this 17th day of December, 2019, by the following vote, to wit:

AYES: Supervisors Frost, Nottoli, Peters, Serna

NOES: None

- ABSENT: Supervisor Kennedy
- **ABSTAIN: None**

RECUSAL: None (PER POLITICAL REFORM ACT (§ 18702.5.)



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In accordance with Section 25103 of the Gavernment Code of the State of California a copy of the document has been

delivered to the Chair of the Board of Supervisors, County

ard of Supervisors

of Sacramento on 12 .17.19

Chair of the Board of Supervisors of Sacramento County, California

lorence ? ATTEST: Clerk, Board of Supervisors

FILED BOARD OF SUPERVISORS

C 172019



SACRAMENTO COUNTY

Annual Investment Policy of the Pooled Investment Fund

CALENDAR YEAR 20192020

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SACRAMENTO COUNTY

Annual Investment Policy of the Pooled Investment Fund

CALENDAR YEAR 20192020

I. Authority

Under the Sacramento County Charter, the Board of Supervisors established the position of Director of Finance and by ordinance will annually review and renew the Director of Finance's authority to invest and reinvest all the funds in the County Treasury.

II. Policy Statement

This Investment Policy (Policy) establishes cash management and investment guidelines for the Director of Finance, who is responsible for the stewardship of the Sacramento County Pooled Investment Fund. Each transaction and the entire portfolio must comply with California Government Code and this Policy. All portfolio activities will be judged by the standards of the Policy and its investment objectives. Activities that violate its spirit and intent will be considered contrary to the Policy.

III. Standard of Care

The Director of Finance is the Trustee of the Pooled Investment Fund and therefore, a fiduciary subject to the prudent investor standard. The Director of Finance, employees involved in the investment process, and members of the Sacramento County Treasury Oversight Committee (Oversight Committee) shall refrain from all personal business activities that could conflict with the management of the investment program. All individuals involved will be required to report all gifts and income in accordance with California state law. When investing, reinvesting, purchasing, acquiring, exchanging, selling and managing public funds, the Director of Finance shall act with care, skill, prudence, and diligence to meet the aims of the investment objectives listed in Section IV, Investment Objectives.

IV. Investment Objectives

The Pooled Investment Fund shall be prudently invested in order to earn a reasonable return, while awaiting application for governmental purposes. The specific objectives for the Pooled Investment Fund are ranked in order of importance.

A. Safety of Principal

The preservation of principal is the primary objective. Each transaction shall seek to ensure that capital losses are avoided, whether they be from securities default or erosion of market value.

B. Liquidity

As a second objective, the Pooled Investment Fund should remain sufficiently flexible to enable the Director of Finance to meet all operating requirements that may be reasonably anticipated in any depositor's fund.

C. Public Trust

In managing the Pooled Investment Fund, the Director of Finance and the authorized investment traders should avoid any transactions that might impair public confidence in Sacramento County and the participating local agencies. Investments should be made with precision and care, considering the probable safety of the capital as well as the probable income to be derived.

D. Maximum Rate of Return

As the fourth objective, the Pooled Investment Fund should be designed to attain a market average rate of return through budgetary and economic cycles, consistent with the risk limitations, prudent investment principles and cash flow characteristics identified herein. For comparative purposes, the State of California Local Agency Investment Fund (LAIF) will be used as a performance benchmark. The Pooled Investment Fund quarterly performance benchmark target has been set at or above LAIF's yield. This benchmark was chosen because LAIF's portfolio structure is similar to the Pooled Investment Fund.

V. Pooled Investment Fund Investors

The Pooled Investment Fund investors are comprised of Sacramento County, school and community college districts, districts directed by the Board of Supervisors, and independent special districts whose treasurer is the Director of Finance. Any local agencies not included in this category are subject to California Government Code section 53684 and are referred to as outside investors.

VI. Implementation

In order to provide direction to those responsible for management of the Pooled Investment Fund, the Director of Finance has established this Policy and will provide it to the Oversight Committee and render it to legislative bodies of local agencies that participate in the Pooled Investment Fund. In accordance with California Government Code section 53646, et seq., the Board of Supervisors shall review and approve this Policy annually.

This Policy provides a detailed description of investment parameters used to implement the investment process and includes the following: investable funds; authorized instruments; prohibited investments; credit requirements; maximum maturities and concentrations; repurchase agreements; Community Reinvestment Act Program; criteria and qualifications of broker/dealers and direct issuers; investment guidelines, management style and strategy; Approved Lists; and calculation of yield and costs.

VII. Internal Controls

The Director of Finance shall establish internal controls to provide reasonable assurance that the investment objectives are met and to ensure that the assets are protected from loss, theft, or misuse. To assist in implementation and internal controls, the Director of Finance has established an Investment Group and a Review Group.

The Investment Group, which is comprised of the Director of Finance and his/her designees, is responsible for maintenance of the investment guidelines and Approved Lists. These guidelines and lists can be altered daily, if needed, to adjust to the ever-changing financial markets. The guidelines can be more conservative or match the policy language. In no case can the guidelines override the Policy.

The Review Group, which is comprised of the Director of Finance and his/her designees, is responsible for the monthly review and appraisal of all the investments purchased by the Director of Finance and staff. This review includes bond proceeds, which are invested separately from the Pooled Investment Fund and are not governed by this Policy.

The Director of Finance shall establish a process for daily, monthly, quarterly, and annual review and monitoring of the Pooled Investment Fund activity. The following articles, in order of supremacy, govern the Pooled Investment Fund:

- 1. California Government Code
- 2. Annual Investment Policy
- 3. Current Investment Guidelines
- 4. Approved Lists (see page 9, Section IX.K)

The Director of Finance shall review the daily investment activity and corresponding bank balances.

Monthly, the Review Group shall review all investment activity and its compliance to the corresponding governing articles and investment objectives.

Quarterly, the Director of Finance will provide the Oversight Committee with a copy of the Pooled Investment Fund activity and its compliance to the annual Policy and California Government Code.

Annually, the Oversight Committee shall cause an annual audit of the activities within the Pooled Investment Fund to be conducted to determine compliance to the Policy and California Government Code. This audit will include issues relating to the structure of the investment portfolio and risk.

All securities purchased, with the exception of time bank deposits, money market mutual funds, and LAIF and Wells Fargo's overnight investment fund, shall be delivered to the independent third-party custodian selected by the Director of Finance. This includes all collateral for repurchase agreements. All trades, where applicable, will be executed by delivery versus payment by the designated third-party custodian.

VIII. Sacramento County Treasury Oversight Committee

In accordance with California Government Code section 27130 et seq., the Board of Supervisors, in consultation with the Director of Finance, has created the Sacramento County Treasury Oversight Committee (Oversight Committee). Annually, the Director of Finance shall prepare an Investment Policy that will be forwarded to and monitored by the Oversight Committee and rendered to Boards of all local agency participants. The Board of Supervisors shall review and approve the Policy during public session. Quarterly, the Director of Finance shall provide the Oversight Committee a report of all investment activities of the Pooled Investment Fund to ensure compliance to the Policy. Annually, the Oversight Committee shall cause an audit to be conducted on the Pooled Investment Fund. The meetings of the Oversight Committee shall be open to the public and subject to the Ralph M. Brown Act.

A member of the Oversight Committee may not be employed by an entity that has contributed to the campaign of a candidate for the office of local treasurer, or contributed to the campaign of a candidate to be a member of a legislative body of any local agency that has deposited funds in the county treasury, in the previous three years or during the period that the employee is a member of the Oversight Committee. A member may not directly or indirectly raise money for a candidate for local treasurer or a member of the Sacramento County Board of Supervisors or governing board of any local agency that has deposited funds in the county treasury while a member of the Oversight Committee. Finally, a member may not secure employment with, or be employed by bond underwriters, bond counsel, security brokerages or dealers, or financial services firms, with whom the treasurer is doing business during the period that the person is a member of the Oversight Committee or for one year after leaving the committee.

The Oversight Committee is not allowed to direct individual investment decisions, select individual investment advisors, brokers or dealers, or impinge on the day-to-day operations of the Department of Finance treasury and investment operations.

IX. Investment Parameters

A. Investable Funds

Total Investable Funds (TIF) for purposes of this Policy are all Pooled Investment Fund moneys that are available for investment at any one time, including the estimated bank account float. Included in TIF are funds of outside investors, if applicable, for which the Director of Finance provides investment services. Excluded from TIF are all funds held in separate portfolios.

The Cash Flow Horizon is the period in which the Pooled Investment Fund cash flow can be reasonably forecasted. This Policy establishes the Cash Flow Horizon to be one (1) year.

Once the Director of Finance has deemed that the cash flow forecast can be met, the Director of Finance may invest funds with maturities beyond one year. These securities will be referred to as the Core Portfolio.

B. Authorized Investments

Authorized investments shall match the general categories established by the California Government Code sections 53601 et seq. and 53635 et seq. Authorized investments shall include, in accordance with California Government Code section 16429.1, investments into LAIF. Authorization for specific instruments within these general categories, as well as narrower portfolio concentration and maturity limits, will be established and maintained by the Investment Group as part of the Investment Guidelines. As the California Government Code is amended, this Policy shall likewise become amended.

C. Prohibited Investments

No investments shall be authorized that have the possibility of returning a zero or negative yield if held to maturity. These shall include inverse floaters, range notes, and interest only strips derived from a pool of mortgages.

All legal investments issued by a tobacco-related company are prohibited. A tobacco-related company is defined as an entity that makes smoking products from tobacco used in cigarettes, cigars, or snuff or for smoking in pipes. The tobacco-related issuers restricted from any investment are any component companies in the Dow Jones U.S. Tobacco Index or the NYSE Arca Tobacco Index. Annually the Director of Finance and/or his designee will update the list of tobacco-related companies.

D. Credit Requirements

Except for municipal obligations and Community Reinvestment Act (CRA) bank deposits and certificates of deposit, the issuer's short-term credit ratings shall be at or above A-1 by Standard & Poor's, P-1 by Moody's, and, if available, F1 by Fitch, and the issuer's long-term credit ratings shall be at or above A by Standard & Poor's, A2 by Moody's, and, if available, A by Fitch. There are no credit requirements for Registered State Warrants. All other municipal obligations shall be at or above a short-term rating of SP-1 by Standard & Poor's, MIG1 by Moody's, and, if available, F1 by Fitch. In addition, domestic banks are limited to those with a Fitch Viability rating of a or better, without regard to modifiers. The Investment Group is granted the authority to specify approved California banks with Fitch Viability ratings of bbb+ but they must have a Support rating of 1 where appropriate. Foreign banks with domestic licensed offices must have a Sovereign rating of AAA from Standard and Poor's, Moody's, or Fitch and a Fitch Viability rating of a or better, without regard to modifiers; however, a foreign bank may have a rating of bbb+ but they must have a support rating of a or better, without regard to modifiers banks with domestic licensed offices must have a Sovereign rating of AAA from Standard and Poor's, Moody's, or Fitch and a Fitch Viability rating of a or better, without regard to modifiers; however, a foreign bank may have a rating of bbb+ but they must have a Support rating of 1. Domestic savings banks must be rated a or better, without regard to modifiers, or may have a rating of bbb+ but they must a Support rating of 1.

Maximum Amount	Minimum Requirements		
Up to the FDIC- or	<u>Banks</u> — FDIC Insurance Coverage		
NCUSIF-insured limit for the term of the deposit			
Over the FDIC- or NCUSIF-insured limit to \$10 million	(Any 2 of 3 ratings)S&P:A-2Moody's:P-2Fitch:F-2Collateral is requiredOR		

Community Reinvestment Act Program Credit Requirements

Eligible banks must have Community Reinvestment Act performance ratings of "satisfactory" or "outstanding" from each financial institution's regulatory authority. In addition, deposits greater than the federally-insured amount must be collateralized. Banks must place securities worth between 110% and 150% of the value of the deposit with the Federal Reserve Bank of San Francisco, the Home Loan Bank of San Francisco, or a trust bank.

Since credit unions do not have Community Reinvestment Act performance ratings, they must demonstrate their commitment to meeting the community reinvestment lending and charitable activities, which are also required of banks.

All commercial paper and medium-term note issues must be issued by corporations operating within the United States and having total assets in excess of one billion dollars (\$1,000,000,000).

The Investment Group may raise these credit standards as part of the Investment Guidelines and Approved Lists. Appendix A provides a Comparison and Interpretation of Credit Ratings by Standard & Poor's, Moody's, and Fitch.

E. Maximum Maturities

Due to the nature of the invested funds, no investment with limited market liquidity should be used. Appropriate amounts of highly-liquid investments, such as Treasury and Agency securities, should be maintained to accommodate unforeseen withdrawals.

The maximum maturity, determined as the term from the date of ownership to the date of maturity, for each investment shall be established as follows:

U.S. Treasury and Agency Obligations	5 years
Washington Supranational Obligations ¹	5 years
Municipal Notes	5 years
Registered State Warrants	5 years
Bankers Acceptances	180 days
Commercial Paper	270 days
Negotiable Certificates of Deposit	180 days
CRA Bank Deposit/Certificates of Deposit	1 year
Repurchase Agreements	1 year
Reverse Repurchase Agreements	92 days
Medium-Term Corporate Notes	180 days
Collateralized Mortgage Obligations	180 days

The Investment Group may reduce these maturity limits to a shorter term as part of the Investment Guidelines and the Approved Lists.

The ultimate maximum maturity of any investment shall be five (5) years. The dollar-weighted average maturity of all securities shall be equal to or less than three (3) years.

F. Maximum Concentrations

No more than 80% of the portfolio may be invested in issues other than United States Treasuries and Government Agencies. The maximum allowable percentage for each type of security is set forth as follows:

U.S. Treasury and Agency Obligations		
Municipal Notes	80%	
Registered State Warrants	80%	
Bankers Acceptances	40%	
Commercial Paper	40%	
Washington Supranational Obligations		
Negotiable Certificates of Deposit and CRA Bank Deposit/Certificates of Deposit .30%		
Repurchase Agreements		
Reverse Repurchase Agreements		
Medium-Term Corporate Notes		
Money Market Mutual Funds		
Collateralized Mortgage Obligations		
Local Agency Investment Fund (LAIF)	per State limit) ²	

The Investment Group may reduce these concentrations as part of the Investment Guidelines and the Approved Lists.

¹ The International Bank for Reconstruction and Development, International Finance Corporation, and Inter-American Development Bank.

² LAIF current maximum allowed is \$65 million.

No more than 10% of the portfolio, except Treasuries and Agencies, may be invested in securities of a single issuer including its related entities.

Where a percentage limitation is established above, for the purpose of determining investment compliance, that maximum percentage will be applied on the date of purchase.

G. Repurchase Agreements

Under California Government Code section 53601, paragraph (j) and section 53635, the Director of Finance may enter into Repurchase Agreements and Reverse Repurchase Agreements. The maximum maturity of a Repurchase Agreement shall be one year. The maximum maturity of a reverse repurchase agreement shall be 92 days, and the proceeds of a reverse repurchase agreement may not be invested beyond the expiration of the agreement. The reverse repurchase agreement must be "matched to maturity" and meet all other requirements in the code.

All repurchase agreements must have an executed Sacramento County Master Repurchase Agreement on file with both the Director of Finance and the Broker/Dealer. Repurchase Agreements executed with approved broker-dealers must be collateralized with either: (1) U.S. Treasuries or Agencies with a market value of 102% for collateral marked to market daily; or (2) money market instruments which are on the Approved Lists of the County and which meet the qualifications of the Policy, with a market value of 102%. Since the market value of the underlying securities is subject to daily market fluctuations, investments in repurchase agreements shall be in compliance if the value of the underlying securities is brought back up to 102% no later than the next business day. Use of mortgage-backed securities for collateral is not permitted. Strictly for purposes of investing the daily excess bank balance, the collateral provided by the Sacramento County's depository bank can be Treasuries or Agencies valued at 110%, or mortgage-backed securities valued at 150%.

H. Community Reinvestment Act Program

The Director of Finance has allocated within the Pooled Investment Fund, a maximum of \$90 million for the Community Reinvestment Act Program to encourage community investment by financial institutions, which includes community banks and credit unions, and to acknowledge and reward local financial institutions which support the community's financial needs. The Director of Finance may increase this amount, as appropriate, while staying within the investment policy objectives and maximum maturity and concentration limits. The eligible banks and savings banks must have Community Reinvestment Act performance ratings of "satisfactory" or "outstanding" from each financial institution's regulatory authority. The minimum credit requirements are located on page 5 of Section IX.D.

I. Criteria and Qualifications of Brokers/Dealers and Direct Issuers

All transactions initiated on behalf of the Pooled Investment Fund and Sacramento County shall be executed through either government security dealers reporting as primary dealers to the Market Reports Division of the Federal Reserve Bank of New York or direct issuers that directly issue their own securities which have been placed on the Approved List of

brokers/dealers and direct issuers. Further, these firms must have an investment grade rating from at least two national rating services, if available.

Brokers/Dealers and direct issuers which have exceeded the political contribution limits, as contained in Rule G-37 of the Municipal Securities Rulemaking Board, within the preceding four-year period to the Director of Finance, any member of the Board of Supervisors, or any candidate for the Board of Supervisors, are prohibited from the Approved List of brokers/dealers and direct issuers.

Each broker/dealer and direct issuer will be sent a copy of this Policy and a list of those persons authorized to execute investment transactions. Each firm must acknowledge receipt of such materials to qualify for the Approved List of brokers/dealers and direct issuers.

Each broker/dealer and direct issuer authorized to do business with Sacramento County shall, at least annually, supply the Director of Finance with audited financial statements.

J. Investment Guidelines, Management Style and Strategy

The Investment Group, named by the Director of Finance, shall issue and maintain Investment Guidelines specifying authorized investments, credit requirements, permitted transactions, and issue maturity and concentration limits which are consistent with this Policy.

The Investment Group shall also issue a statement describing the investment management style and current strategy for the entire investment program. The management style and strategy can be changed to accommodate shifts in the financial markets, but at all times they must be consistent with this Policy and its objectives.

K. Approved Lists

The Investment Group, named by the Director of Finance, shall issue and maintain various Approved Lists. These lists are:

- 1. Approved Domestic Banks for all legal investments.
- 2. Approved Foreign Banks for all legal investments.
- 3. Approved Commercial Paper and Medium Term Note Issuers.
- 4. Approved Money Market Mutual Funds.
- 5. Approved Firms for Purchase or Sale of Securities (Brokers/Dealers and Direct Issuers).
- 6. Approved Banks / Credit Unions for the Community Reinvestment Act Program.

L. Calculation of Yield and Costs

The costs of managing the investment portfolio, including but not limited to: investment management; accounting for the investment activity; custody of the assets; managing and accounting for the banking; receiving and remitting deposits; oversight controls; and indirect and overhead expenses are charged to the investment earnings based upon actual labor hours worked in respective areas. Costs of these respective areas are accumulated by specific cost

accounting projects and charged to the Pooled Investment Fund on a quarterly basis throughout the fiscal year.

The Department of Finance will allocate the net interest earnings of the Pooled Investment Fund quarterly. The net interest earnings are allocated based upon the average daily cash balance of each Pooled Investment Fund participant.

X. Reviewing, Monitoring and Reporting of the Portfolio

The Review Group will prepare and present to the Director of Finance at least monthly a comprehensive review and evaluation of the transactions, positions, performance of the Pooled Investment Fund and compliance to the California Government Code, Policy, and Investment Guidelines.

Quarterly, the Director of Finance will provide to the Oversight Committee and to any local agency participant that requests a copy, a detailed report on the Pooled Investment Fund. Pursuant to California Government Code section 53646, the report will list the type of investments, name of issuer, maturity date, par and dollar amount of the investment. For the total Pooled Investment Fund, the report will list average maturity, the market value, and the pricing source. Additionally, the report will show any funds under the management of contracting parties, a statement of compliance to the Policy and a statement of the Pooled Investment Fund's ability to meet the expected expenditure requirements for the next six months.

Each quarter, the Director of Finance shall provide to the Board of Supervisors and interested parties a comprehensive report on the Pooled Investment Fund.

Annually, the Director of Finance shall provide to the Oversight Committee the Investment Policy. Additionally, the Director of Finance will render a copy of the Investment Policy to the legislative body of the local agencies that participate in the Pooled Investment Fund.

XI. Withdrawal Requests for Pooled Fund Investors

The Director of Finance will honor all requests to withdraw funds for normal cash flow purposes that are approved by the Director of Finance at a one dollar net asset value. Any requests to withdraw funds for purposes other than immediate cash flow needs, such as for external investing, are subject to the consent of the Director of Finance. In accordance with California Government Code Sections 27133(h) and 27136, such requests for withdrawals must first be made in writing to the Director of Finance. When evaluating a request to withdraw funds, the Director of Finance will take into account the effect of a withdrawal on the stability and predictability of the Pooled Investment Fund and the interests of other depositors. Any withdrawal for such purposes will be at the market value of the Pooled Investment Fund on the date of the withdrawal.

XII. Limits on Honoraria, Gifts, and Gratuities

In accordance with California Government Code Section 27133(d), this Policy establishes limits for the Director of Finance; individuals responsible for management of the portfolios; and members of the Investment Group and Review Group who direct individual investment decisions, select individual investment advisors and broker/dealers, and conduct day-to-day investment

trading activity. The limits also apply to members of the Oversight Committee. Any individual who receives an aggregate total of gifts, honoraria and gratuities in excess of \$50 in a calendar year from a broker/dealer, bank or service provider to the Pooled Investment Fund must report the gifts, dates and firms to the designated filing official and complete the appropriate State forms.

No individual may receive aggregate gifts, honoraria, and gratuities from any single source in a calendar year in excess of the amount specified in Section 18940.2(a) of Title 2, Division 6 of the California Code of Regulations. This limitation was is \$470-500 for the period January 1, 20172019, to December 31, 20182020, and is adjusted for inflation every odd-numbered year. Any violation must be reported to the State Fair Political Practices Commission.

XIII. Terms and Conditions for Outside Investors

Outside investors may invest in the Pooled Investment Fund through California Government Code Section 53684. Their deposits are subject to the consent of the Director of Finance. The legislative body of the local agency must approve the Sacramento County Pooled Investment Fund as an authorized investment and execute a Memorandum of Understanding. Any withdrawal of these deposits must be made in writing 30 days in advance and will be paid based upon the market value of the Pooled Investment Fund. If the Director of Finance considers it appropriate, the deposits may be returned at any time to the local agency.

Appendix A

Comparison and Interpretation of Credit Ratings

Rating Interpretation	Moody's	S&P	Fitch	Fitch Viability Rating
Best-quality grade	Aaa	AAA	AAA	aaa
	Aa1	AA+	AA+	aa+
High-quality grade	Aa2	AA	AA	aa
	Aa3	AA-	AA-	aa-
	A1	A+	A+	a+
Upper Medium Grade	A2	А	А	а
	A3	A-	A-	a-
	Baa1	BBB+	BBB+	bbb+
Medium Grade	Baa2	BBB	BBB	bbb
	Baa3	BBB-	BBB-	bbb-
	Ba1	BB+	BB+	bb+
Speculative Grade	Ba2	BB	BB	bb
	Ba3	BB-	BB-	bb-
	B1	B+	B+	b+
Low Grade	B2	В	В	b
	B3	B-	B-	b-
Poor Grade to Default	Caa	CCC+	CCC	ссс
	-	CCC	-	
In Poor Standing	-	CCC-	-	
Highly Sugar Lating Default	Ca	CC	CC	сс
Highly Speculative Default	С	-	-	с
	-	-	DDD	f
Default	-	-	DD	f
	-	D	D	f

Short Term / Municipal Note Investment Grade Ratings

Rating Interpretation	Moody's	S&P	Fitch
Superior Capacity	MIG-1	SP-1+/SP-1	F1+/F1
Strong Capacity	MIG-2	SP-2	F2
Acceptable Capacity	MIG-3	SP-3	F3

Appendix A

Short Term / Commercial Paper Investment Grade Ratings			
Rating Interpretation	Moody's	S&P	Fitch
Superior Capacity	P-1	A-1+/A-1	F1+/F1
Strong Capacity	P-2	A-2	F2
Acceptable Capacity	P-3	A-3	F3

Fitch Support Ratings		
Rating	Interpretation	
1	A bank for which there is an extremely high probability of external support. The potential provider of support is very highly rated in its own right and has a very high propensity to support the bank in question. This probability of support indicates a minimum Long-Term Rating floor of 'A-'.	
2	A bank for which there is a high probability of external support. The potential provider of support is highly rated in its own right and has a high propensity to provide support to the bank in question. This probability of support indicates a minimum Long-Term Rating floor of 'BBB-'.	
3	A bank for which there is a moderate probability of support because of uncertainties about the ability or propensity of the potential provider of support to do so. This probability of support indicates a minimum Long-Term Rating floor of 'BB-'.	
4	A bank for which there is a limited probability of support because of significant uncertainties about the ability or propensity of any possible provider of support to do so. This probability of support indicates a minimum Long-Term Rating floor of 'B'.	
5	A bank for which external support, although possible, cannot be relied upon. This may be due to a lack of propensity to provide support or to very weak financial ability to do so. This probability of support indicates a Long-Term Rating floor no higher than 'B-' and in many cases no floor at all.	

Appendix A

Fitch Sover	eign Risk Ratings	
Rating	Interpretation	
AAA	Highest credit quality. 'AAA' ratings denote the lowest expectation of default risk. They are assigned only in cases of exceptionally strong capacity for payment of financial commitments. This capacity is highly unlikely to be adversely affected by foreseeable events.	
AA	Very high credit quality. 'AA' ratings denote expectations of very low default risk. They indicate very strong capacity for payment of financial commitments. This capacity is not significantly vulnerable to foreseeable events.	
А	High credit quality. 'A' ratings denote expectations of low default risk. The capacity for payment of financial commitments is considered strong. This capacity may, nevertheless, be more vulnerable to adverse business or economic conditions than is the case for higher ratings.	
BBB	Good credit quality. 'BBB' ratings indicate that expectations of default risk are currently low. The capacity for timely payment of financial commitments is considered adequate but adverse business of economic conditions are more likely to impair this capacity.	
BB	Speculative. 'BB' ratings indicate an elevated vulnerability to default risk, particularly in the event of adverse changes in business or economic conditions over time.	
В	Highly speculative. 'B' ratings indicate that material default risk is present, but a limited margin of safety remains. Financial commitments are currently being met; however, capacity for continued payment is vulnerable to deterioration in the business and economic environment.	
CCC	High default risk. Default is a real possibility.	
CC	Very high levels of credit risk. Default of some kind appears probable.	
С	Exceptionally high levels of credit risk. Default appears imminent or inevitable.	
D	 Default. Indicates a default. Default generally is defined as one of the following: Failure to make payment of principal and/or interest under the contractual terms of the rated obligation; The bankruptcy filings, administration, receivership, liquidation or other winding-up or cessation of the business of an issuer/obligor; or The coercive exchange of an obligation, where creditors were offered securities with diminished structural or economic terms compared with the existing obligation. 	



SACRAMENTO COUNTY

Annual Investment Policy of the Pooled Investment Fund

CALENDAR YEAR 2020

Approved by the Sacramento County Board of Supervisors

December 17, 2019 Resolution No. 2019-0856

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SACRAMENTO COUNTY

Annual Investment Policy of the Pooled Investment Fund

CALENDAR YEAR 2020

I. Authority

Under the Sacramento County Charter, the Board of Supervisors established the position of Director of Finance and by ordinance will annually review and renew the Director of Finance's authority to invest and reinvest all the funds in the County Treasury.

II. Policy Statement

This Investment Policy (Policy) establishes cash management and investment guidelines for the Director of Finance, who is responsible for the stewardship of the Sacramento County Pooled Investment Fund. Each transaction and the entire portfolio must comply with California Government Code and this Policy. All portfolio activities will be judged by the standards of the Policy and its investment objectives. Activities that violate its spirit and intent will be considered contrary to the Policy.

III. Standard of Care

The Director of Finance is the Trustee of the Pooled Investment Fund and therefore, a fiduciary subject to the prudent investor standard. The Director of Finance, employees involved in the investment process, and members of the Sacramento County Treasury Oversight Committee (Oversight Committee) shall refrain from all personal business activities that could conflict with the management of the investment program. All individuals involved will be required to report all gifts and income in accordance with California state law. When investing, reinvesting, purchasing, acquiring, exchanging, selling and managing public funds, the Director of Finance shall act with care, skill, prudence, and diligence to meet the aims of the investment objectives listed in Section IV, Investment Objectives.

IV. Investment Objectives

The Pooled Investment Fund shall be prudently invested in order to earn a reasonable return, while awaiting application for governmental purposes. The specific objectives for the Pooled Investment Fund are ranked in order of importance.

A. Safety of Principal

The preservation of principal is the primary objective. Each transaction shall seek to ensure that capital losses are avoided, whether they be from securities default or erosion of market value.

B. Liquidity

As a second objective, the Pooled Investment Fund should remain sufficiently flexible to enable the Director of Finance to meet all operating requirements that may be reasonably anticipated in any depositor's fund.

C. Public Trust

In managing the Pooled Investment Fund, the Director of Finance and the authorized investment traders should avoid any transactions that might impair public confidence in Sacramento County and the participating local agencies. Investments should be made with precision and care, considering the probable safety of the capital as well as the probable income to be derived.

D. Maximum Rate of Return

As the fourth objective, the Pooled Investment Fund should be designed to attain a market average rate of return through budgetary and economic cycles, consistent with the risk limitations, prudent investment principles and cash flow characteristics identified herein. For comparative purposes, the State of California Local Agency Investment Fund (LAIF) will be used as a performance benchmark. The Pooled Investment Fund quarterly performance benchmark target has been set at or above LAIF's yield. This benchmark was chosen because LAIF's portfolio structure is similar to the Pooled Investment Fund.

V. Pooled Investment Fund Investors

The Pooled Investment Fund investors are comprised of Sacramento County, school and community college districts, districts directed by the Board of Supervisors, and independent special districts whose treasurer is the Director of Finance. Any local agencies not included in this category are subject to California Government Code section 53684 and are referred to as outside investors.

VI. Implementation

In order to provide direction to those responsible for management of the Pooled Investment Fund, the Director of Finance has established this Policy and will provide it to the Oversight Committee and render it to legislative bodies of local agencies that participate in the Pooled Investment Fund. In accordance with California Government Code section 53646, et seq., the Board of Supervisors shall review and approve this Policy annually.

This Policy provides a detailed description of investment parameters used to implement the investment process and includes the following: investable funds; authorized instruments; prohibited investments; credit requirements; maximum maturities and concentrations; repurchase agreements; Community Reinvestment Act Program; criteria and qualifications of broker/dealers and direct issuers; investment guidelines, management style and strategy; Approved Lists; and calculation of yield and costs.

VII. Internal Controls

The Director of Finance shall establish internal controls to provide reasonable assurance that the investment objectives are met and to ensure that the assets are protected from loss, theft, or misuse. To assist in implementation and internal controls, the Director of Finance has established an Investment Group and a Review Group.

The Investment Group, which is comprised of the Director of Finance and his/her designees, is responsible for maintenance of the investment guidelines and Approved Lists. These guidelines and lists can be altered daily, if needed, to adjust to the ever-changing financial markets. The guidelines can be more conservative or match the policy language. In no case can the guidelines override the Policy.

The Review Group, which is comprised of the Director of Finance and his/her designees, is responsible for the monthly review and appraisal of all the investments purchased by the Director of Finance and staff. This review includes bond proceeds, which are invested separately from the Pooled Investment Fund and are not governed by this Policy.

The Director of Finance shall establish a process for daily, monthly, quarterly, and annual review and monitoring of the Pooled Investment Fund activity. The following articles, in order of supremacy, govern the Pooled Investment Fund:

- 1. California Government Code
- 2. Annual Investment Policy
- 3. Current Investment Guidelines
- 4. Approved Lists (see page 9, Section IX.K)

The Director of Finance shall review the daily investment activity and corresponding bank balances.

Monthly, the Review Group shall review all investment activity and its compliance to the corresponding governing articles and investment objectives.

Quarterly, the Director of Finance will provide the Oversight Committee with a copy of the Pooled Investment Fund activity and its compliance to the annual Policy and California Government Code.

Annually, the Oversight Committee shall cause an annual audit of the activities within the Pooled Investment Fund to be conducted to determine compliance to the Policy and California Government Code. This audit will include issues relating to the structure of the investment portfolio and risk.

All securities purchased, with the exception of bank deposits, money market mutual funds, and LAIF, shall be delivered to the independent third-party custodian selected by the Director of Finance. This includes all collateral for repurchase agreements. All trades, where applicable, will be executed by delivery versus payment by the designated third-party custodian.

VIII. Sacramento County Treasury Oversight Committee

In accordance with California Government Code section 27130 et seq., the Board of Supervisors, in consultation with the Director of Finance, has created the Sacramento County Treasury Oversight Committee (Oversight Committee). Annually, the Director of Finance shall prepare an Investment Policy that will be forwarded to and monitored by the Oversight Committee and rendered to Boards of all local agency participants. The Board of Supervisors shall review and approve the Policy during public session. Quarterly, the Director of Finance shall provide the Oversight Committee a report of all investment activities of the Pooled Investment Fund to ensure compliance to the Policy. Annually, the Oversight Committee shall cause an audit to be conducted on the Pooled Investment Fund. The meetings of the Oversight Committee shall be open to the public and subject to the Ralph M. Brown Act.

A member of the Oversight Committee may not be employed by an entity that has contributed to the campaign of a candidate for the office of local treasurer, or contributed to the campaign of a candidate to be a member of a legislative body of any local agency that has deposited funds in the county treasury, in the previous three years or during the period that the employee is a member of the Oversight Committee. A member may not directly or indirectly raise money for a candidate for local treasurer or a member of the Sacramento County Board of Supervisors or governing board of any local agency that has deposited funds in the county treasury while a member of the Oversight Committee. Finally, a member may not secure employment with, or be employed by bond underwriters, bond counsel, security brokerages or dealers, or financial services firms, with whom the treasurer is doing business during the period that the person is a member of the Oversight Committee or for one year after leaving the committee.

The Oversight Committee is not allowed to direct individual investment decisions, select individual investment advisors, brokers or dealers, or impinge on the day-to-day operations of the Department of Finance treasury and investment operations.

IX. Investment Parameters

A. Investable Funds

Total Investable Funds (TIF) for purposes of this Policy are all Pooled Investment Fund moneys that are available for investment at any one time, including the estimated bank account float. Included in TIF are funds of outside investors, if applicable, for which the Director of Finance provides investment services. Excluded from TIF are all funds held in separate portfolios.

The Cash Flow Horizon is the period in which the Pooled Investment Fund cash flow can be reasonably forecasted. This Policy establishes the Cash Flow Horizon to be one (1) year.

Once the Director of Finance has deemed that the cash flow forecast can be met, the Director of Finance may invest funds with maturities beyond one year. These securities will be referred to as the Core Portfolio.

B. Authorized Investments

Authorized investments shall match the general categories established by the California Government Code sections 53601 et seq. and 53635 et seq. Authorized investments shall include, in accordance with California Government Code section 16429.1, investments into LAIF. Authorization for specific instruments within these general categories, as well as narrower portfolio concentration and maturity limits, will be established and maintained by the Investment Group as part of the Investment Guidelines. As the California Government Code is amended, this Policy shall likewise become amended.

C. Prohibited Investments

No investments shall be authorized that have the possibility of returning a zero or negative yield if held to maturity. These shall include inverse floaters, range notes, and interest only strips derived from a pool of mortgages.

All legal investments issued by a tobacco-related company are prohibited. A tobacco-related company is defined as an entity that makes smoking products from tobacco used in cigarettes, cigars, or snuff or for smoking in pipes. The tobacco-related issuers restricted from any investment are any component companies in the Dow Jones U.S. Tobacco Index or the NYSE Arca Tobacco Index. Annually the Director of Finance and/or his designee will update the list of tobacco-related companies.

D. Credit Requirements

Except for municipal obligations and Community Reinvestment Act (CRA) bank deposits and certificates of deposit, the issuer's short-term credit ratings shall be at or above A-1 by Standard & Poor's, P-1 by Moody's, and, if available, F1 by Fitch, and the issuer's long-term credit ratings shall be at or above A by Standard & Poor's, A2 by Moody's, and, if available, A by Fitch. There are no credit requirements for Registered State Warrants. All other municipal obligations shall be at or above a short-term rating of SP-1 by Standard & Poor's, MIG1 by Moody's, and, if available, F1 by Fitch. In addition, domestic banks are limited to those with a Fitch Viability rating of a or better, without regard to modifiers. The Investment Group is granted the authority to specify approved California banks with Fitch Viability ratings of bbb+ but they must have a Support rating of 1 where appropriate. Foreign banks with domestic licensed offices must have a Sovereign rating of AAA from Standard and Poor's, Moody's, or Fitch and a Fitch Viability rating of a or better, without regard to modifiers; however, a foreign bank may have a rating of bbb+ but they must have a Support rating of 1. Domestic savings banks must be rated a or better, without regard to modifiers, or may have a rating of bbb+ but they must a Support rating of 1.

Maximum Amount	Minimum Requirements		
Up to the FDIC- or	Banks — FDIC Insurance Cover	rage	
NCUSIF-insured limit for the term of the deposit		rance Coverage deposit of the NCUSIF-insured limit since zed rating agencies and are not required to	
Over the FDIC- or NCUSIF-insured limit	(Any 2 of 3 ratings) S&P: A-2 Moody's: P-2 Fitch: F-2 Collateral is required	Through a private sector entity that assists in the placement of deposits to achieve FDIC insurance coverage of the full deposit and accrued interest.	

Eligible banks must have Community Reinvestment Act performance ratings of "satisfactory" or "outstanding" from each financial institution's regulatory authority. In addition, deposits greater than the federally-insured amount must be collateralized. Banks must place securities worth between 110% and 150% of the value of the deposit with the Federal Reserve Bank of San Francisco, the Home Loan Bank of San Francisco, or a trust bank.

Since credit unions do not have Community Reinvestment Act performance ratings, they must demonstrate their commitment to meeting the community reinvestment lending and charitable activities, which are also required of banks.

All commercial paper and medium-term note issues must be issued by corporations operating within the United States and having total assets in excess of one billion dollars (\$1,000,000,000).

The Investment Group may raise these credit standards as part of the Investment Guidelines and Approved Lists. Appendix A provides a Comparison and Interpretation of Credit Ratings by Standard & Poor's, Moody's, and Fitch.

E. Maximum Maturities

Due to the nature of the invested funds, no investment with limited market liquidity should be used. Appropriate amounts of highly-liquid investments, such as Treasury and Agency securities, should be maintained to accommodate unforeseen withdrawals.

The maximum maturity, determined as the term from the date of ownership to the date of maturity, for each investment shall be established as follows:

U.S. Treasury and Agency Obligations	5 years
Washington Supranational Obligations ¹	5 years
Municipal Notes	5 years
Registered State Warrants	5 years
Bankers Acceptances	180 days
Commercial Paper	270 days
Negotiable Certificates of Deposit	180 days
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Repurchase Agreements	1 year
Reverse Repurchase Agreements	92 days
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Collateralized Mortgage Obligations	180 days

The Investment Group may reduce these maturity limits to a shorter term as part of the Investment Guidelines and the Approved Lists.

The ultimate maximum maturity of any investment shall be five (5) years. The dollar-weighted average maturity of all securities shall be equal to or less than three (3) years.

F. Maximum Concentrations

No more than 80% of the portfolio may be invested in issues other than United States Treasuries and Government Agencies. The maximum allowable percentage for each type of security is set forth as follows:

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Registered State Warrants	80%
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Washington Supranational Obligations	
Negotiable Certificates of Deposit and CRA Bank Deposit/Certificates	of Deposit .30%
Repurchase Agreements	
Reverse Repurchase Agreements	20%
Medium-Term Corporate Notes	
Money Market Mutual Funds	20%
Collateralized Mortgage Obligations	20%
Local Agency Investment Fund (LAIF)	.(per State limit)

The Investment Group may reduce these concentrations as part of the Investment Guidelines and the Approved Lists.

¹ The International Bank for Reconstruction and Development, International Finance Corporation, and Inter-American Development Bank.

No more than 10% of the portfolio, except Treasuries and Agencies, may be invested in securities of a single issuer including its related entities.

Where a percentage limitation is established above, for the purpose of determining investment compliance, that maximum percentage will be applied on the date of purchase.

G. Repurchase Agreements

Under California Government Code section 53601, paragraph (j) and section 53635, the Director of Finance may enter into Repurchase Agreements and Reverse Repurchase Agreements. The maximum maturity of a Repurchase Agreement shall be one year. The maximum maturity of a reverse repurchase agreement shall be 92 days, and the proceeds of a reverse repurchase agreement may not be invested beyond the expiration of the agreement. The reverse repurchase agreement must be "matched to maturity" and meet all other requirements in the code.

All repurchase agreements must have an executed Sacramento County Master Repurchase Agreement on file with both the Director of Finance and the Broker/Dealer. Repurchase Agreements executed with approved broker-dealers must be collateralized with either: (1) U.S. Treasuries or Agencies with a market value of 102% for collateral marked to market daily; or (2) money market instruments which are on the Approved Lists of the County and which meet the qualifications of the Policy, with a market value of 102%. Since the market value of the underlying securities is subject to daily market fluctuations, investments in repurchase agreements shall be in compliance if the value of the underlying securities is brought back up to 102% no later than the next business day. Use of mortgage-backed securities for collateral is not permitted. Strictly for purposes of investing the daily excess bank balance, the collateral provided by the Sacramento County's depository bank can be Treasuries or Agencies valued at 110%, or mortgage-backed securities value at 150%.

H. Community Reinvestment Act Program

The Director of Finance has allocated within the Pooled Investment Fund, a maximum of \$90 million for the Community Reinvestment Act Program to encourage community investment by financial institutions, which includes community banks and credit unions, and to acknowledge and reward local financial institutions which support the community's financial needs. The Director of Finance may increase this amount, as appropriate, while staying within the investment policy objectives and maximum maturity and concentration limits. The eligible banks and savings banks must have Community Reinvestment Act performance ratings of "satisfactory" or "outstanding" from each financial institution's regulatory authority. The minimum credit requirements are located on page 5 of Section IX.D.

I. Criteria and Qualifications of Brokers/Dealers and Direct Issuers

All transactions initiated on behalf of the Pooled Investment Fund and Sacramento County shall be executed through either government security dealers reporting as primary dealers to the Market Reports Division of the Federal Reserve Bank of New York or direct issuers that directly issue their own securities which have been placed on the Approved List of

brokers/dealers and direct issuers. Further, these firms must have an investment grade rating from at least two national rating services, if available.

Brokers/Dealers and direct issuers which have exceeded the political contribution limits, as contained in Rule G-37 of the Municipal Securities Rulemaking Board, within the preceding four-year period to the Director of Finance, any member of the Board of Supervisors, or any candidate for the Board of Supervisors, are prohibited from the Approved List of brokers/dealers and direct issuers.

Each broker/dealer and direct issuer will be sent a copy of this Policy and a list of those persons authorized to execute investment transactions. Each firm must acknowledge receipt of such materials to qualify for the Approved List of brokers/dealers and direct issuers.

Each broker/dealer and direct issuer authorized to do business with Sacramento County shall, at least annually, supply the Director of Finance with audited financial statements.

J. Investment Guidelines, Management Style and Strategy

The Investment Group, named by the Director of Finance, shall issue and maintain Investment Guidelines specifying authorized investments, credit requirements, permitted transactions, and issue maturity and concentration limits which are consistent with this Policy.

The Investment Group shall also issue a statement describing the investment management style and current strategy for the entire investment program. The management style and strategy can be changed to accommodate shifts in the financial markets, but at all times they must be consistent with this Policy and its objectives.

K. Approved Lists

The Investment Group, named by the Director of Finance, shall issue and maintain various Approved Lists. These lists are:

- 1. Approved Domestic Banks for all legal investments.
- 2. Approved Foreign Banks for all legal investments.
- 3. Approved Commercial Paper and Medium Term Note Issuers.
- 4. Approved Money Market Mutual Funds.
- 5. Approved Firms for Purchase or Sale of Securities (Brokers/Dealers and Direct Issuers).
- 6. Approved Banks / Credit Unions for the Community Reinvestment Act Program.

L. Calculation of Yield and Costs

The costs of managing the investment portfolio, including but not limited to: investment management; accounting for the investment activity; custody of the assets; managing and accounting for the banking; receiving and remitting deposits; oversight controls; and indirect and overhead expenses are charged to the investment earnings based upon actual labor hours worked in respective areas. Costs of these respective areas are accumulated by specific cost

accounting projects and charged to the Pooled Investment Fund on a quarterly basis throughout the fiscal year.

The Department of Finance will allocate the net interest earnings of the Pooled Investment Fund quarterly. The net interest earnings are allocated based upon the average daily cash balance of each Pooled Investment Fund participant.

X. Reviewing, Monitoring and Reporting of the Portfolio

The Review Group will prepare and present to the Director of Finance at least monthly a comprehensive review and evaluation of the transactions, positions, performance of the Pooled Investment Fund and compliance to the California Government Code, Policy, and Investment Guidelines.

Quarterly, the Director of Finance will provide to the Oversight Committee and to any local agency participant that requests a copy, a detailed report on the Pooled Investment Fund. Pursuant to California Government Code section 53646, the report will list the type of investments, name of issuer, maturity date, par and dollar amount of the investment. For the total Pooled Investment Fund, the report will list average maturity, the market value, and the pricing source. Additionally, the report will show any funds under the management of contracting parties, a statement of compliance to the Policy and a statement of the Pooled Investment Fund's ability to meet the expected expenditure requirements for the next six months.

Each quarter, the Director of Finance shall provide to the Board of Supervisors and interested parties a comprehensive report on the Pooled Investment Fund.

Annually, the Director of Finance shall provide to the Oversight Committee the Investment Policy. Additionally, the Director of Finance will render a copy of the Investment Policy to the legislative body of the local agencies that participate in the Pooled Investment Fund.

XI. Withdrawal Requests for Pooled Fund Investors

The Director of Finance will honor all requests to withdraw funds for normal cash flow purposes that are approved by the Director of Finance at a one dollar net asset value. Any requests to withdraw funds for purposes other than immediate cash flow needs, such as for external investing, are subject to the consent of the Director of Finance. In accordance with California Government Code Sections 27133(h) and 27136, such requests for withdrawals must first be made in writing to the Director of Finance. When evaluating a request to withdraw funds, the Director of Finance will take into account the effect of a withdrawal on the stability and predictability of the Pooled Investment Fund and the interests of other depositors. Any withdrawal for such purposes will be at the market value of the Pooled Investment Fund on the date of the withdrawal.

XII. Limits on Honoraria, Gifts, and Gratuities

In accordance with California Government Code Section 27133(d), this Policy establishes limits for the Director of Finance; individuals responsible for management of the portfolios; and members of the Investment Group and Review Group who direct individual investment decisions,

select individual investment advisors and broker/dealers, and conduct day-to-day investment trading activity. The limits also apply to members of the Oversight Committee. Any individual who receives an aggregate total of gifts, honoraria and gratuities in excess of \$50 in a calendar year from a broker/dealer, bank or service provider to the Pooled Investment Fund must report the gifts, dates and firms to the designated filing official and complete the appropriate State forms.

No individual may receive aggregate gifts, honoraria, and gratuities from any single source in a calendar year in excess of the amount specified in Section 18940.2(a) of Title 2, Division 6 of the California Code of Regulations. This limitation is \$500 for the period January 1, 2019, to December 31, 2020, and is adjusted for inflation every odd-numbered year. Any violation must be reported to the State Fair Political Practices Commission.

XIII. Terms and Conditions for Outside Investors

Outside investors may invest in the Pooled Investment Fund through California Government Code Section 53684. Their deposits are subject to the consent of the Director of Finance. The legislative body of the local agency must approve the Sacramento County Pooled Investment Fund as an authorized investment and execute a Memorandum of Understanding. Any withdrawal of these deposits must be made in writing 30 days in advance and will be paid based upon the market value of the Pooled Investment Fund. If the Director of Finance considers it appropriate, the deposits may be returned at any time to the local agency.

Appendix A

Comparison and Interpretation of Credit Ratings

Rating Interpretation	Moody's	S&P	Fitch	Fitch Viability Rating
Best-quality grade	Aaa	AAA	AAA	aaa
	Aa1	AA+	AA+	aa+
High-quality grade	Aa2	AA	AA	aa
	Aa3	AA-	AA-	aa-
	A1	A+	A+	a+
Upper Medium Grade	A2	А	А	а
	A3	A-	A-	a-
	Baa1	BBB+	BBB+	bbb+
Medium Grade	Baa2	BBB	BBB	bbb
	Baa3	BBB-	BBB-	bbb-
Speculative Grade	Ba1	BB+	BB+	bb+
	Ba2	BB	BB	bb
	Ba3	BB-	BB-	bb-
	B1	B+	B+	b+
Low Grade	B2	В	В	b
	B3	B-	B-	b-
Poor Grade to Default	Caa	CCC+	CCC	ссс
	-	CCC	-	
In Poor Standing	-	CCC-	-	
Highly Sugar Lating Default	Ca	CC	CC	сс
Highly Speculative Default	С	-	-	с
	-	-	DDD	f
Default	-	-	DD	f
	-	D	D	f

Short Term / Municipal Note Investment Grade Ratings

Rating Interpretation	Moody's	S&P	Fitch
Superior Capacity	MIG-1	SP-1+/SP-1	F1+/F1
Strong Capacity	MIG-2	SP-2	F2
Acceptable Capacity	MIG-3	SP-3	F3

Appendix A

Short Term / Commercial Paper Investment Grade Ratings			
Rating Interpretation	Moody's	S&P	Fitch
Superior Capacity	P-1	A-1+/A-1	F1+/F1
Strong Capacity	P-2	A-2	F2
Acceptable Capacity	P-3	A-3	F3

Fitch Support Ratings				
Rating	Interpretation			
1	A bank for which there is an extremely high probability of external support. The potential provider of support is very highly rated in its own right and has a very high propensity to support the bank in question. This probability of support indicates a minimum Long-Term Rating floor of 'A-'.			
2	A bank for which there is a high probability of external support. The potential provider of support is highly rated in its own right and has a high propensity to provide support to the bank in question. This probability of support indicates a minimum Long-Term Rating floor of 'BBB-'.			
3	A bank for which there is a moderate probability of support because of uncertainties about the ability or propensity of the potential provider of support to do so. This probability of support indicates a minimum Long-Term Rating floor of 'BB-'.			
4	A bank for which there is a limited probability of support because of significant uncertainties about the ability or propensity of any possible provider of support to do so. This probability of support indicates a minimum Long-Term Rating floor of 'B'.			
5	A bank for which external support, although possible, cannot be relied upon. This may be due to a lack of propensity to provide support or to very weak financial ability to do so. This probability of support indicates a Long-Term Rating floor no higher than 'B-' and in many cases no floor at all.			

Appendix A

Fitch Sover	eign Risk Ratings
Rating	Interpretation
AAA	Highest credit quality. 'AAA' ratings denote the lowest expectation of default risk. They are assigned only in cases of exceptionally strong capacity for payment of financial commitments. This capacity is highly unlikely to be adversely affected by foreseeable events.
AA	Very high credit quality. 'AA' ratings denote expectations of very low default risk. They indicate very strong capacity for payment of financial commitments. This capacity is not significantly vulnerable to foreseeable events.
А	High credit quality. 'A' ratings denote expectations of low default risk. The capacity for payment of financial commitments is considered strong. This capacity may, nevertheless, be more vulnerable to adverse business or economic conditions than is the case for higher ratings.
BBB	Good credit quality. 'BBB' ratings indicate that expectations of default risk are currently low. The capacity for timely payment of financial commitments is considered adequate but adverse business or economic conditions are more likely to impair this capacity.
BB	Speculative. 'BB' ratings indicate an elevated vulnerability to default risk, particularly in the event of adverse changes in business or economic conditions over time.
В	Highly speculative. 'B' ratings indicate that material default risk is present, but a limited margin of safety remains. Financial commitments are currently being met; however, capacity for continued payment is vulnerable to deterioration in the business and economic environment.
CCC	High default risk. Default is a real possibility.
CC	Very high levels of credit risk. Default of some kind appears probable.
С	Exceptionally high levels of credit risk. Default appears imminent or inevitable.
D	 Default. Indicates a default. Default generally is defined as one of the following: Failure to make payment of principal and/or interest under the contractual terms of the rated obligation; The bankruptcy filings, administration, receivership, liquidation or other winding-up or cessation of the business of an issuer/obligor; or The coercive exchange of an obligation, where creditors were offered securities with diminished structural or economic terms compared with the existing obligation.

LEGISLATIVE UPDATE.

Sacramento County Treasury Oversight Committee Meeting February 21, 2020



Investments Division Bernard Santo Domingo Chief Investment Officer

County of Sacramento

Inter-Departmental Memorandum

February 21, 2020

- To: Treasury Oversight Committee
- From: Dave Matuskey
- Subject: 2019 LEGISLATIVE UPDATE

AB 945

Increases from 30% to 50% the percent of funds local agencies that do not pool deposits can invest in deposits with banks that use a placement service such as CDARS to provide FDIC coverage to the full deposit. Removes the January 1, 2021, sunset date for the authorization for counties to invest in deposits with banks the use a private sector entity to assist in the placement of deposits.

AB 857

Authorizes cities and counties to form public banks subject to approval by the Department of Business Oversight and Federal Deposit Insurance Corporation.

MEMBER UPDATE.

Sacramento County Treasury Oversight Committee Meeting February 21, 2020



Divisions

Administration Auditor-Controller Consolidated Utilities Billing & Service Investments Tax Collection & Business Licensing Treasury

County of Sacramento

Inter-Departmental Memorandum

February 21, 2020

To:	Treasury Oversight Committee
	Ben Lamera
From:	Ben Lamera

Director of Finance

Subject: STATUS REPORT ON MEMBER POSITIONS

School and Community College Districts Representative

The term for the School and Community College Districts Representative expires on June 30, 2020. Requests for nominations will be sent to all school and community college district pool participants in late February.

Public Member Positions

The terms for the Third and Fourth District public members end on June 30, 2020. Contact Dave Matuskey if you need any assistance in reapplying for your position.

DISCUSSION AND ACTION ON THE NON-POOLED FUNDS PORTFOLIO REPORT FOR THE QUARTER ENDED DECEMBER 31, 2019.

Sacramento County Treasury Oversight Committee Meeting February 21, 2020



COUNTY OF SACRAMENTO DEPARTMENT OF FINANCE

NON-POOLED FUNDS PORTFOLIO REPORT

FOR QUARTER ENDED DECEMBER 31, 2019

COUNTY OF SACRAMENTO DEPARTMENT OF FINANCE

NON-POOLED FUNDS PORTFOLIO REPORT

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PORTFOLIO CONCENTRATION & CREDIT QUALITY

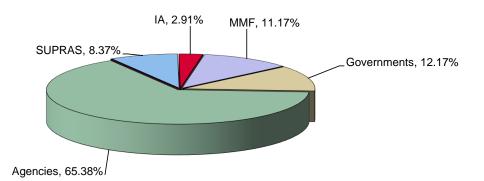
All Non-Pooled Funds	1
Appendix A: Detailed Listing Of Non-Pooled Funds	2
Appendix B: Glossary Of Investment Terms	3

COUNTY OF SACRAMENTO Non-Pooled Funds - December 31, 2019

Portfolio Sector Concentration Profile ALL NON-POOLED FUNDS

Sector	Credit Quality	Dollar Amount At Cost	Percent	
GOVERNMENTS	AA+/Aaa/AAA			
Treasury Bills		\$ 90,639,951.15	11.67%	
Treasury Notes		\$ -	0.00%	
Treasury Bonds		\$ -	0.00%	
SLGs		\$ 3,842,480.00	0.49%	
SUBTOTAL		\$ 94,482,431.15	12.17%	
AGENCIES	AA+/Aaa/AAA			
FHLB		\$ 15,752,708.70	2.03%	
FHLB Discount Notes		\$ 351,700,262.27	45.30%	
FNMA		\$ -	0.00%	
FNMA Discount Notes		\$ -	0.00%	
FFCB		\$ 14,985,129.80	1.93%	
FFCB Discount Notes		\$ 94,703,276.28	12.20%	
FHLMC		\$ -	0.00%	
FHLMC Discount Notes		\$ 30,501,049.63	3.93%	
SUBTOTAL		\$ 507,642,426.68	65.38%	
	A-1/P-1,			
COMMERCIAL PAPER (CP)	or A-1/P-1/F1,	\$ -	0.00%	
ζ, γ	or better			
	A-1/P-1,			
CERTIFICATE OF DEPOSIT (CD)	or A-1/P-1/F1,	\$ -	0.00%	
	or better			
WASHINGTON SUPRANATIONALS (SUPRAS)	AAA/Aaa/AAA	\$ 64,981,830.15	8.37%	
INVESTMENT AGREEMENTS (IA)	Not Rated	\$ 22,595,237.40	2.91%	
LOCAL AGENCY INVESTMENT FUND (LAIF)	Not Rated	\$ -	0.00%	
MONEY MARKET FUNDS (MMF)	AAA	\$ 86,717,435.20	11.17%	
SWEEP	Not Rated	\$ -	0.00%	
TOTAL		\$ 776,419,360.58	100.00%	

Sector concentrations are for all non-pooled funds in the aggregate. A detailed listing of all Non-Pooled Funds is provided in Appendix A on page 2 of this report.



County of Sacramento Non-Pooled Investment Funds

As of December 31, 2019

Fund	Description	Туре	Funded Date	Maturity Date	Amount Issued	Book Value	Bond/Note TIC/NIC			
Fiscal Ag	ent Trustee Funds									
5030-35	REG SAN 2000 C SWAP	REV	1/2/2003	12/1/2030	100,000,000	755,709.70	3.740%			
5277	SASD Series 2015 Refunding	REV	5/5/2015	8/1/2035	45,435,000	127.95	3.392%			
5367-69	North Vineyard No. 1 2016	MR	6/8/2016	9/1/2045	13,410,000	2,176,966.97	3.740%			
5390-93	SRCSD REF 2005	REV	9/7/2005	12/1/2023	61,220,000	1,786.73	4.414%			
5455-57	SRCSD 2014A	REV	7/10/2014	12/1/2044	378,510,000	2,903.37	3.823%			
5510-14	Water Financing Authority	REV	5/9/2007	6/1/2039	413,420,000	23,529,035.51	4.260%			
5520-23 5600-02	Metro Air Park 2007B	MR REV	12/14/2007	8/1/2034	40,200,000	144,731.87	6.886%			
	SRCSD REF 2007	GO	3/1/2007	12/1/2035	443,365,000	2,335.13	4.165% 2.206%			
5696-97 5800-07	San Juan USD, Elec 02, Ser 17 Airport System 2009 A&B	REV	3/14/2017 7/28/2009	8/1/2026 7/1/2041	23,475,000 201,800,000	5,090,056.92 9,957,271.68	5.473%			
5810-15	Airport System 2009 C&D	REV	7/28/2009	7/1/2041	278,250,000	18,012,842.30	6.010%			
5830-34	2010 Refunding COPs	COP	3/12/2010	2/1/2030	126,105,000	12,024,985.36	5.097%			
5860-63	SASD Series 2010 A&B	REV	8/11/2010	8/1/2040	126,620,000	582.25	4.069%			
5870-74	Airport System 2010	REV	8/25/2010	7/1/2040	128,300,000	13,503,794.78	4.744%			
5890-92	San Juan USD, Elec 02, Ser 2011	GO	6/10/2011	6/1/2026	10,600,000	4,139,898.02	5.336%			
5970-76	North Vineyard No. 2 2016	MR	6/8/2016	9/1/2046	23,155,000	3,506,503.88	4.036%			
6126-27	FCUSD SFID #3, Series D	GO	7/31/2019	10/1/2044	150,000,000	147,797,501.03	3.460%			
6581-84	Elliott Ranch Refunding	MR	8/13/1997	9/1/2021	21,415,000	2,874,674.40	6.231%			
6600-04	Laguna Creek Refunding	MR	12/30/1997	12/1/2020	31,980,000	4,095,412.87	5.751%			
6680-86	Metro Air Park	MR	12/30/1998	12/1/2021	5,310,000	1,708,834.23	7.000%			
6820-23	Co. Sanitation Ser. 2001	REV	6/28/2001	12/1/2027	124,010,000	322.42	n/a			
6890-92	Tobacco Settlement 01A/B	TSP	8/23/2001	6/1/2027	193,405,888	550,979.26	n/a			
6980-84	Metro Air Park 2004 A	MR	4/8/2004	8/1/2034	63,460,000	18,106,456.10	6.890%			
50A0	Airport System Refund 2016A	REV	12/21/2016	7/1/2041	89,000,000	2,286,543.39	4.332%			
50B0	Airport System Refund 2016B	REV	12/21/2016	7/1/2041	92,790,000	2,378,836.02	4.373%			
50C0	Sac City USD Series 2017 E	GO	5/25/2017	5/1/2047	112,000,000	47,999,350.73	3.550%			
50C5	Sac City USD Series 2019 D	GO	12/12/2019	8/1/2049	30,900,000	13,941,783.25	2.821%			
50E0	McClellan Park CFD Ser. 2017A	MR	12/14/2017	9/1/2040	29,470,000	2,542,326.16	3.804%			
50F5-F6	Los Rios CCD, 2008 Series D	GO	6/26/2019	8/1/2044	80,000,000	77,748,002.33	2.961%			
50G0-H7	Airports System Ref 2018A-C	REV	5/3/2018	7/1/2039	435,510,000	17,286,157.51	3.488%			
50I0-J3	Airports System Ref 2018D-F	REV	5/3/2018	7/1/2035	137,590,000	6,177,513.35	3.142%			
50K0	FCUSD SFID #5 2018	GO	5/10/2018	10/1/2043	95,000,000	10,072,363.60	3.627%			
50L0-L5	Florin Vineyard CFD No. 1 2018	MR	8/16/2018	9/1/2048	6,610,000	2,406,757.34	3.926%			
50M0	Sac City USD Series 2018F	GO	7/25/2018	8/1/2024	10,000,000	10,116,195.21	2.460%			
50P0-P1	Galt JUSD Series 2018	GO	11/6/2018	8/1/2047	20,000,000	9,324,698.50	4.082%			
50R0-R1	San Juan USD, Elec 16, Ser 19	GO	1/23/2019	8/1/2029	80,000,000	67,398,095.96	2.149%			
50R6-R7	San Juan USD, Elec 12, Ser 19	GO	1/23/2019	8/1/2031	150,000,000	70,471,325.40	2.806%			
50S0-S1	Elk Grove USD, Elec 16, Ser 19	GO	2/20/2019	8/1/2048	121,000,000	41,291,461.85	3.565%			
50T0-T1	Fair Oaks Rec & Park Ser 2019	GO	4/10/2019	8/1/2048	9,435,000	7,563,498.62	3.301%			
50U0-U6	Robla SD, Series 2019 A & J	GO	6/13/2019	8/1/2048	48,040,000	49,841,747.15	3.446%			
50V0-V1	Natomas USD, Elec 18, Ser 19	GO Bo	8/1/2019 ok Value Subtotal	8/1/2049 Of Fiscal Agen	60,000,000 t Trustee Funds:	53,713,789.29 \$760,544,158.39	3.079%			
Other Se	parate Trustees					+				
5410	Tobacco Securitization Authority 200	5 Refunding								
	Collection Account		12/6/2005	6/1/2045		2.55				
	Operating Account		12/6/2005	6/1/2045		92,128.61				
	Sr Debt Service Account		12/6/2005	6/1/2045		10,272.49				
	Sr Liquidity Reserve Account		12/6/2005	6/1/2045		15,770,206.57				
	Sr Turbo Redemption Account		12/6/2005	6/1/2045		2,591.97				
	Subtotal					15,875,202.19				
	Boo		btotal Of Funds He	-	-	\$15,875,202.19				
New issues	are reflected in blue.	TOTAL N	ON-POOLED INVE	STMENT FUND	S BOOK VALUE:	\$776,419,360.58				
				ndo						
	TSP - Tobacco Securitization Proceeds MR - Mello Roos Bonds									
	& Revenue Anticipation Notes		GO - General Oblig							
SEP - Fur	nds held for unique purposes		AD - Assessment D	istrict Bonds						
REV - Rev	venue Bonds		COP - Certificates of	f Participation						
	Collection Account									

GLOSSARY OF INVESTMENT TERMS

A-1+/A-1 – Highest short-term credit ratings assigned by Standard & Poor's.

AAA – Highest long-term credit rating assigned by Standard & Poor's and Fitch.

Aaa – Highest long-term credit rating assigned by Moody's.

AA+ – Second highest long-term credit rating assigned by Standard & Poor's and Fitch.

Cash in Pool – Residual amounts of money invested in the Pooled Investment Fund that cannot be reasonably invested in separate investment securities (amounts typically less than \$100,000 per fund).

F1+/F1 – Highest short-term credit ratings assigned by Fitch.

FFCB – Federal Farm Credit Bank

FHLB – Federal Home Loan Bank

FHLMC – Federal Home Loan Mortgage Corporation

FNMA – Federal National Mortgage Association

Investment Agreement – A contract between a bond issuer and a financial institution that provides the issuer with a guaranteed interest rate for the duration of the contract.

LAIF – Local Agency Investment Fund is the State of California Treasurer's Pool, which is created under Section 16429.1 of the Government Code. The County uses this account as a late draw savings account and as investments for TRANs proceeds.

P-1 – Highest short-term credit rating assigned by Moody's.

Sweep – A money market account at Wells Fargo that invests any residual dollars into overnight securities (similar to cash in pool).

Washington Supranational – **A** Washington, D.C.-based international organization formed by multiple central governments to promote economic development for the member countries.

DISCUSSION AND ACTION ON THE QUARTERLY REPORT OF THE POOLED INVESTMENT FUND FOR THE QUARTER ENDED DECEMBER 31, 2019, AND COMPLIANCE WITH INVESTMENT POLICY.

Sacramento County Treasury Oversight Committee Meeting February 21, 2020



Quarterly Pooled Investment Fund Report As Prescribed By

California Government Code Section 53646

For The Quarter Ended December 31, 2019

Compliance to Investment Policy

Based on the Director of Finance's Review Group Month-End Reports, there were no items out of compliance with the Calendar Year 2019 Investment Policy during the quarter ended December 31, 2019.

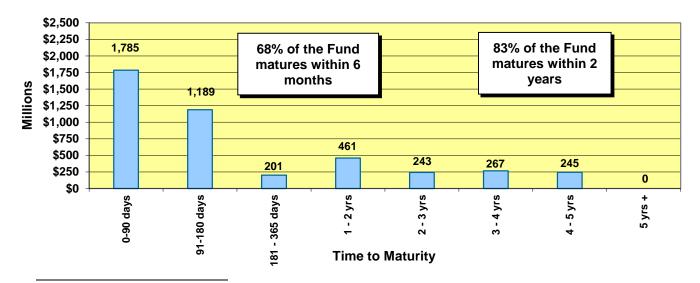
Portfolio Statistics	Quarter Ended 09/30/19	Quarter Ended 12/31/19
Average Daily Balance	\$3,658,920,049	\$3,670,717,039
Period-End Balance	\$3,554,687,797	\$4,390,056,625
Earned Interest Yield	2.326%	2.090%
Weighted Average Maturity	384 Days	340 Days
Duration in Years	1.019	0.904
Amortized Book Value	\$3,556,089,508	\$4,392,057,123
Market Value	\$3,581,524,567	\$4,414,274,467
Percent of Market to Cost	100.72%	100.51%

The earned interest yield presented above does not have any costs deducted. The investment management costs in prior years and this year continue to be approximately 10 basis points or 0.10%. The quarterly apportionment of earnings to participating funds will be made on a cash basis (as opposed to an accrual basis) for the first three quarters of the fiscal year. Earnings to participating funds will be annualized over the fiscal year based on a fund's cumulative average daily cash balance at each quarter end and fiscal year end. At fiscal year end (fourth quarter), the earnings of the Pool will be converted to an accrual basis for the fourth quarter earnings' allocation.

Portfolio Structure as of December 31, 2019¹

Investment Description	Percentage of Portfolio at Cost 09/30/19	Percentage of Portfolio at Cost 12/31/19	Percentage of Portfolio at Market 12/31/19	Earned Interest Yield at 12/31/19
US Agency, Treasury & Municipal Notes (USATM):				
US Agency Notes	27.63%	27.06%	27.08%	1.916%
Notes/Discount Notes FFCB	9.28%	7.96%	7.98%	2.093%
Notes/Discount Notes FHLB	12.33%	13.10%	13.09%	1.881%
Notes/Discount Notes FNMA	4.77%	3.63%	3.64%	1.831%
Notes/Discount Notes FHLMC	1.25%	2.37%	2.37%	1.647%
US Treasury Notes	0.00%	0.00%	0.00%	0.00%
Municipal Notes	0.49%	0.80%	0.79%	2.326%
Total USATM	28.11%	27.86%	27.87%	1.928%
Repurchase Agreements	0.00%	0.00%	0.00%	0.000%
Supranationals	18.45%	14.94%	15.13%	2.471%
Commercial Paper	30.51%	30.21%	30.16%	1.871%
Certificates of Deposit	21.10%	25.51%	25.38%	1.897%
LAIF	1.83%	1.48%	1.47%	2.103%
Money Market Accounts	0.00%	0.00%	0.00%	0.00%

POOLED INVESTMENT FUND MATURITIES AS OF DECEMBER 31, 2019 \$4.390 Billion



¹ Percentages may not add up to 100% due to rounding

Projected Cash Flow

Based upon our cash flow model projection dated January 15, 2019, summarized below, we have sufficient cash flow to meet expenditures for the next 12 months.

Month	Bank Balance	Receipts & Maturities	Disbursements	Difference	Less Investments Beyond One Year	Funds Available for Future Cash Flow Needs*
			Dollar amounts	s represented	in millions	
Jan	20.0	\$1,538.1	\$1,031.1	\$507.0	\$45.0	\$462.0
Feb	20.0	\$1,035.3	\$704.4	\$330.9	\$45.0	\$285.9
Mar	20.0	\$1,345.2	\$759.5	\$585.7	\$45.0	\$540.7
Apr	20.0	\$1,474.9	\$768.8	\$706.1	\$45.0	\$661.1
May	20.0	\$1,241.4	\$940.1	\$301.3	\$45.0	\$256.3
Jun	20.0	\$1,217.9	\$971.7	\$246.2	\$45.0	\$201.2
Jul	20.0	\$698.8	\$1,285.5	(\$586.7)	\$45.0	(\$631.7)
Aug	20.0	\$584.3	\$781.8	(\$197.5)	\$45.0	(\$242.5)
Sep	20.0	\$778.7	\$912.0	(\$133.3)	\$45.0	(\$178.3)
Oct	20.0	\$766.1	\$792.9	(\$26.8)	\$45.0	(\$71.8)
Nov	20.0	\$797.7	\$768.5	\$29.2	\$45.0	(\$15.8)
Dec	20.0	\$1,551.5	\$903.3	\$648.2	\$45.0	\$603.2

*Any excess net cash flow amounts in this column will be used to fund negative cash flow positions in later months.

Detailed Listing of Investments

A complete detailed listing of all investments for the Pooled Investment Fund as of December 31, 2019, is contained in the back of this report. This report notes the type of investment; name of the security; the CUSIP; the purchase date; the maturity date; the coupon and the yield; the par value, book value and market value of each security; the pricing source for the market value; and the duration of each security.

External third-party investment manager(s) at December 31, 2019:

Investment	<u>Firm</u>	<u>Amount</u>
Local Agency Investment Fund	State Treasurer's Office	\$65,000,000.00

The Fund uses an external investment accounting system called APS2 by FIS AvantGard. The market valuations are based upon the pricing of Interactive Data Corporation (IDC).

THIS COMPLETES THE QUARTERLY REPORT REQUIREMENTS OF CALIFORNIA GOVERNMENT CODE § 53646.

Quarterly Pooled Investment Fund Report As Prescribed By California Government Code Section 53646 Page 4

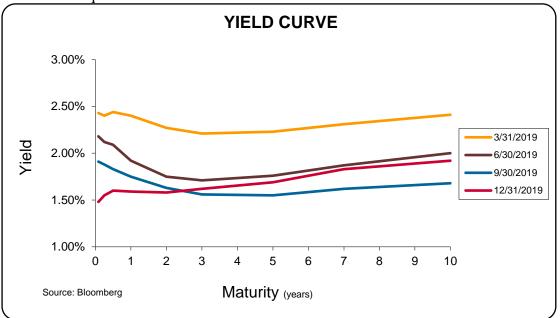
Financial Markets Commentary

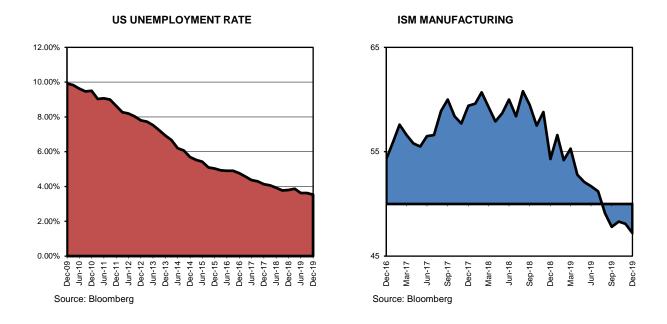
The Federal Open Market Committee (FOMC) cut the federal funds rate three times in 2019 ending the year with a 1.50%-1.75% overnight rate. These were the first rate cuts by the FOMC since the Great Recession and were done by the FOMC to help continue the longest economic expansion in US History. The recession fears that peaked in the third quarter of 2019 eased with these monetary policy moves as the equity markets hit new highs. The Federal Reserve has indicated that a neutral monetary policy stance is warranted and that the federal funds rate is unlikely to change in 2020.

The US economy ended 2019 with near full employment and benign inflationary pressures. The unemployment rate in December was 3.5%, near its 50-year lows. US wage growth in December fell to 2.9%, an 18-month low, which should anchor inflation expectations. The core consumer prices index remained low at 2.3% in December and near the FOMC's target rate of 2.0%. The Federal Reserve has indicated it will need to see persistent above-trend inflation numbers before it would consider a tightening monetary policy. The Federal Reserve's current forecast is for 1.9% in 2020 and 2.0% in 2021 and 2022.

Although forecasts see a recession in 2020 as unlikely, certain parts of the US economy are showing signs of slowing. In December 2019, the ISM manufacturing index, a closely watched leading indicator of the US economy, recorded its lowest reading since the end of the last recession in 2009. The index fell below the key level of 50 for five straight months. A below-50 reading indicates the manufacturing sector is shrinking.

The US economy has been increasingly relying on American consumers in keeping the economy from falling into recession. US gross domestic product (GDP) is now nearly 100% reliant on consumer spending to remain positive. Tariffs were a major cause of weakness and a partial trade deal between the US and China will ease pressure on the US economy. However, a weak corporate investment climate as the stimulus from the 2018 tax cuts dissipates and weaker global growth, particularly from China, which posted its lowest annual GDP in 2019 in almost 30 years, point to slower US economic growth. With the Federal Reserve stating its intention of keeping monetary policy neutral in the US election year and slowing but still positive US economic growth, we expect the yield on the Pooled Investment Fund to move moderately lower from its current levels over the next few quarters.





Portfolio Management Strategy

During the past quarter, we continued to provide adequate liquidity to meet the cash flow needs of the Pooled Investment Fund participants. We are currently funding the cash flows for July 2020. We are purchasing two- and five-year U. S. Treasury, U.S. Agency, and Washington Supranational securities on a monthly basis for the "CORE" portfolio, which is composed of all securities maturing beyond one year. This laddered structure stabilizes the yield over longer periods. Over the next quarter, our quarterly yield should range between 1.80% and 1.90%.

Respectfully submitted,	Concur,
Bernard Santo Domingo	Ben Lamera
Chief Investment Officer	Director of Finance

Attachment County of Sacramento Short-Term Investment Portfolio

Release Date: January 21, 2020

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DESCRIPTION	<u>CUSIP</u>	<u>PURCHASE</u> DATE	MATURITY DATE	INTEREST RATE	<u>TRADING</u> YIELD	PAR VALUE	BOOK VALUE	MARKET VALUE	<u>SOURCE</u>	<u>DURATION</u> (YEARS)
		DAIL	DATE							(TEARS)
VR-SAC COUNTY 15-16		10/27/2015	8/3/2020	2.326%	2.326%	1,114,333.62	1,114,333.62	1,114,333.62	BOOK	0.591
VR-SAC COUNTY 16-17		11/1/2016	8/2/2021	2.326%	2.326%	2,015,360.97	2,015,360.97	2,015,360.97	BOOK	1.577
VR-SAC COUNTY 17-18		11/14/2017	8/1/2022	2.326%	2.326%	3,694,050.53	3,694,050.53	3,694,050.53	BOOK	2.546
VR-SAC COUNTY 18-19		12/4/2018	8/1/2023	2.326%	2.326%	7,485,413.32	7,485,413.32	7,485,413.32	BOOK	3.461
VR-SAC COUNTY 19-20		11/19/2019	8/1/2024	2.326%	2.326%	20,638,708.00	20,638,708.00	20,638,708.00	BOOK	4.385
TOTAL VARIABLE RATE(MUNI)QUARTERLY				2.326%	2.326%	34,947,866.44	34,947,866.44	34,947,866.44		3.710
						0.79%	0.80%	0.79%		
FFCB NOTE (260)	3133EE5Z9	8/28/2015	8/4/2020	1.750%	1.700%	10,000,000.00	10,023,500.00	10,012,600.00	SUNGARD	0.587
FFCB NOTE (20)	3133EJWP0	8/15/2018	8/10/2020	2.710%	2.685%	25,000,000.00	25,012,100.00	25,177,000.00		0.602
FFCB NOTE (120)	3133EFLZ8	10/28/2015	10/28/2020	1.460%	1.460%	5,000,000.00	5,000,000.00	4,998,150.00		0.821
FFCB NOTE (86)	3133EFLZ8	10/28/2015		1.460%	1.460%	5,000,000.00	5,000,000.00	4,998,150.00		0.821
FFCB NOTE (170)	3133EJ2R9	12/14/2018	12/14/2020	2.750%	2.847%	25,000,000.00	24,953,050.00	25,298,000.00	SUNGARD	0.946
FFCB NOTE (120)	3133EJ4Q9	1/11/2019	1/11/2021	2.550%	2.596%	25,000,000.00	24,977,750.00	25,249,000.00	SUNGARD	1.009
FFCB NOTE (85)	3133EFYZ4	2/18/2016	2/10/2021	1.375%	1.495%	10,000,000.00	9,942,600.00	9,979,300.00	SUNGARD	1.098
FFCB NOTE (170)	3133EKAJ5	2/11/2019	2/11/2021	2.500%	2.545%	25,000,000.00	24,978,100.00	25,255,750.00		1.093
FFCB NOTE (170)	3133EKFP6	4/5/2019	4/5/2021	2.230%	2.395%	25,000,000.00	24,919,950.00	25,207,500.00	SUNGARD	1.245
FFCB NOTE (170)	3133EKZV1	8/16/2019	8/16/2021	1.550%	1.705%	25,000,000.00	24,923,975.00	24,996,500.00	SUNGARD	1.602
FFCB NOTE (170)	3133EKY75	10/15/2019	10/15/2021	1.400%	1.555%	25,000,000.00	24,923,950.00	24,927,500.00	SUNGARD	1.768
FFCB NOTE (0260)	3133EK6D3	11/8/2019	11/8/2021	1.570%	1.625%	25,000,000.00	24,972,875.00	25,001,000.00	SUNGARD	1.830
FFCB NOTE (260)	3133EHTS2	8/9/2017	8/3/2022	1.900%	1.895%	20,000,000.00	20,004,700.00	20,148,800.00	SUNGARD	2.519
FFCB NOTE (120)	3133EHYR8	9/14/2017	9/13/2022	1.750%	1.849%	20,000,000.00	19,906,200.00	20,074,800.00	SUNGARD	2.636
FFCB NOTE (330)	3133EJ3Q0	12/21/2018	12/21/2023	2.875%	2.852%	20,000,000.00	20,021,380.00	20,945,400.00	SUNGARD	3.779
FFCB NOTE (170)	3133EKQU3	6/26/2019	6/13/2024	1.950%	1.877%	20,000,000.00	20,069,200.00	20,173,000.00	SUNGARD	4.280
FFCB NOTE (170)	3133EKA63	8/23/2019	8/16/2024	1.600%	1.554%	20,000,000.00	20,043,880.00	19,858,400.00	SUNGARD	4.450
FFCB NOTE (0120)	3133EK6J0	11/8/2019	11/8/2024	1.625%	1.821%	20,000,000.00	19,813,600.00	19,859,000.00	SUNGARD	4.674
TOTAL FED FARM CREDIT BONDS(FFCB)				2.033%	2.093%	350,000,000.00	349,486,810.00	352,159,850.00		2.069
				2.03370	2.05570	7.95%	7.96%	7.98%		2.005
		- 4								
FHLB NOTE (20)	313378J77	4/23/2015	3/13/2020	1.875%	1.455%	10,000,000.00	10,197,500.00	10,004,200.00		0.200
FHLB NOTE (120)	313383HU8	6/12/2015	6/12/2020	1.750%	1.903%	10,000,000.00	9,927,290.00	10,002,800.00		0.449
FHLB NOTE (45)	313383HU8	7/14/2015	6/12/2020	1.750%	1.851%	10,000,000.00	9,952,800.00	10,002,800.00		0.449
FHLB NOTE (330)	3130A5Z77	9/28/2015	7/29/2020	1.830%	1.600%	10,000,000.00	10,106,700.00	10,010,500.00		0.573
FHLB NOTE (170)	3130AF2D8		10/15/2020	2.860%	2.861%	25,000,000.00	24,999,325.00	25,232,750.00		0.782
FHLB NOTE (20)	3130A1W95	6/12/2019	6/11/2021	2.250%	2.014%	25,000,000.00	25,114,750.00	25,219,250.00		1.428
FHLB NOTE (170)	3130AGLD5	7/8/2019	7/7/2021	1.875%	1.832%	25,000,000.00	25,021,175.00	25,107,250.00		1.489
FHLB NOTE (170)	313378JP7	9/9/2019	9/10/2021	2.375%	1.573%	25,000,000.00	25,393,675.00	25,323,750.00		1.657
FHLB NOTE (45)	3130AABG2	12/16/2016		1.875%	2.228%	20,000,000.00	19,670,800.00	20,107,400.00		1.883
FHLB NOTE (0020)	313376C94		12/10/2021	2.625%	1.602%	25,000,000.00	25,503,990.00	25,464,500.00		1.904
FHLB NOTE (170)	313378CR0	3/13/2017	3/11/2022	2.250%	2.129%	20,000,000.00	20,114,200.00	20,260,400.00	SUNGARD	2.140

DESCRIPTION	CUSIP	PURCHASE				PAR VALUE	BOOK VALUE	MARKET VALUE	SOURCE	<u>DURATION</u> (YEARS)
		<u>DATE</u>	<u>DATE</u>	<u>RATE</u>	<u>YIELD</u>					(TEARS)
FHLB NOTE (120)	313379Q69	6/13/2017	6/10/2022	2.125%	1.888%	20,000,000.00	20,225,000.00	20,230,400.00	SUNGARD	2.390
FHLB NOTE (120)	3130ABS23	7/14/2017	7/14/2022	2.000%	2.000%	20,000,000.00	20,000,000.00	20,194,200.00		2.463
FHLB NOTE (170)	3130A3KM5	12/12/2017	12/9/2022	2.500%	2.240%	20,000,000.00	20,243,840.00	20,496,600.00	SUNGARD	2.848
FHLB NOTE (86)	313383YJ4	11/27/2018	9/8/2023	3.375%	3.038%	20,000,000.00	20,297,200.00	21,218,200.00	SUNGARD	3.463
FHLB NOTE (170)	3130A0F70	1/9/2019	12/8/2023	3.375%	2.734%	20,000,000.00	20,585,640.00	21,245,600.00	SUNGARD	3.715
FHLB NOTE (170)	3130A1XJ2	7/10/2019	6/14/2024	2.875%	1.964%	20,000,000.00	20,851,300.00	20,999,000.00		4.212
FHLB NOTE (170)	3130A2UW4	9/16/2019	9/13/2024	2.875%	1.802%	20,000,000.00	21,019,820.00	21,046,600.00	SUNGARD	4.402
FHLB NOTE (170)	3130A2UW4	10/16/2019	9/13/2024	2.875%	1.698%	20,000,000.00	21,104,000.00	21,046,600.00		4.403
FHLB NOTE (0170)	3130A3GE8	12/13/2019	12/13/2024	2.750%	1.736%	20,000,000.00	20,967,200.00	20,963,600.00	SUNGARD	4.664
TOTAL FED HOME LOAN BANKS				2.471%	2.035%	385,000,000.00	391,296,205.00	394,176,400.00		2.436
						8.75%	8.91%	8.93%		
FNMA NOTE (20)	3135G0A78	1/30/2015	1/21/2020	1.625%	1.431%	10,000,000.00	10,092,965.20	10,000,300.00	SUNGARD	0.057
FNMA NOTE (120)	3135G0A78	2/13/2015	1/21/2020	1.625%	1.658%	10,000,000.00	9,984,400.00	10,000,300.00	SUNGARD	0.057
FNMA (330)	3135G0UU5	3/24/2015	3/6/2020	1.750%	1.544%	10,000,000.00	10,097,580.00	10,002,500.00	SUNGARD	0.181
FNMA NOTE (120)	3135G0H55	12/28/2015		1.875%	1.836%	10,000,000.00	10,018,400.00	10,024,400.00	SUNGARD	0.987
FNMA NOTE (20)	3135G0Q89	10/13/2016	10/7/2021	1.375%	1.497%	20,000,000.00	19,883,440.00	19,924,000.00	SUNGARD	1.746
FNMA NOTE (45)	3135G0Q89	11/16/2016	10/7/2021	1.375%	1.775%	20,000,000.00	19,626,600.00	19,924,000.00		1.746
FNMA NOTE (45)	3135G0S38	1/17/2017	1/5/2022	2.000%	2.043%	20,000,000.00	19,959,800.00	20,154,200.00		1.962
FNMA NOTE (120)	3135G0T45	5/9/2017	4/5/2022	1.875%	2.005%	20,000,000.00	19,878,800.00	20,128,800.00		2.215
FNMA NOTE (330)	3135G0T78	10/18/2017	10/5/2022	2.000%	2.031%	20,000,000.00	19,970,560.00	20,215,000.00		2.688
FNMA NOTE (330)	3135G0T78	11/6/2017	10/5/2022	2.000%	2.065%	20,000,000.00	19,939,400.00	20,215,000.00	SUNGARD	2.688
TOTAL FED NAT MORT ASSOC				1.759%	1.831%	160,000,000.00	159,451,945.20	160,588,500.00		1.708
						3.64%	3.63%	3.64%		
FHLB DISC NOTE (0086)	313384XP9	12/31/2019	6/1/2020	1.520%	1.530%	100,000,000.00	99,354,000.00	99,337,000.00	SUNGARD	0.419
FHLB DISC NOTE (0023)	313384XT1	12/16/2019	6/5/2020	1.570%	1.582%	45,000,000.00	44,662,450.00	44,694,000.00		0.430
FHLB DISC NOTE (0004)	313384YA1	12/16/2019	6/12/2020	1.570%	1.582%	40,000,000.00	39,687,744.44	39,715,600.00	SUNGARD	0.449
TOTAL FHLB DISC NOTES				1.543%	1.554%	185,000,000.00	183,704,194.44	183,746,600.00		0.428
						4.20%	4.18%	4.16%		
FHLMC DISC NOTE (0170)	313396XW8	12/30/2019	6/8/2020	1.555%	1.566%	60,000,000.00	59,582,741.67	59,583,950.00	SUNGARD	0.438
TOTAL FHLMC DISC NOTES				1.555%	1.566%	60,000,000.00	59,582,741.67	59,583,950.00		0.438
						1.36%	1.36%	1.35%		000
FHLMC NOTE (170)	3137EAEE5	1/4/2018	1/17/2020	1.500%	1.985%	25,000,000.00	24,759,250.00	24,997,500.00	SUNGARD	0.047
FHLMC NOTE (120)	3137EADR7	5/20/2015	5/1/2020	1.375%	1.625%	10,000,000.00	9,881,500.00	9,990,800.00	SUNGARD	0.334
FHLMC NOTE (170)	3137EAEC9	8/17/2016	8/12/2021	1.125%	1.314%	10,000,000.00	9,908,900.00	9,926,200.00	SUNGARD	1.597

DESCRIPTION	<u>CUSIP</u>	<u>PURCHASE</u> <u>DATE</u>	<u>MATURITY</u> <u>DATE</u>	<u>INTEREST</u> <u>RATE</u>	<u>TRADING</u> <u>YIELD</u>	PAR VALUE	BOOK VALUE	MARKET VALUE	SOURCE	DURATION (YEARS)
TOTAL FHLMC				1.389%	1.756%	45,000,000.00 1.02%	44,549,650.00 1.01%	44,914,500.00 1.02%		0.455
IADB NOTE (45)	4581X0BL1	2/13/2018	2/14/2020	3.875%	2.255%	25,000,000.00	25,788,750.00	25,058,500.00	SUNGARD	0.123
IBRD NOTE (20)	459058FA6	3/8/2018	3/30/2020	1.376%	2.362%	25,000,000.00	24,506,925.00	24,976,000.00	SUNGARD	0.246
IFC NOTE (45)	45950VLS3	4/12/2018	4/9/2020	2.460%	2.460%	25,000,000.00	25,000,000.00		SUNGARD	0.274
IADB NOTE (20)	4581X0CX4	5/9/2018		1.625%	2.626%	25,000,000.00	24,513,471.25	24,985,500.00	SUNGARD	0.364
IADB NOTE (170)	4581X0CX4	6/5/2018	5/12/2020	1.625%	2.599%	25,000,000.00	24,543,200.00	24,985,500.00	SUNGARD	0.364
IFC NOTE (170)	45950VLZ7	7/20/2018	7/20/2020	2.690%	2.732%	25,000,000.00	24,979,650.00	24,979,650.00	SUNGARD	0.546
IBRD NOTE (45)	459058GA5	9/10/2018	9/4/2020	1.626%	2.735%	25,000,000.00	24,468,150.00	24,980,000.00	SUNGARD	0.671
IADB NOTE (45)	4581X0CD8	11/12/2015	11/9/2020	2.125%	1.887%	10,000,000.00	10,112,900.00	10,033,400.00	SUNGARD	0.850
IFC NOTE (170)	45950VMQ6	11/13/2018	11/13/2020	3.000%	3.038%	25,000,000.00	24,981,600.00	25,227,250.00	SUNGARD	0.859
IBRD NOTE (45)	45905UUY8	2/4/2016	2/4/2021	1.550%	1.550%	10,000,000.00	10,000,000.00	9,973,500.00	SUNGARD	1.080
IBRD NOTE (45)	459058EW9	3/9/2016	3/9/2021	1.626%	1.667%	10,000,000.00	9,979,880.00	9,993,600.00	SUNGARD	1.177
IBRD NOTE(45)	459058EW9	4/22/2016	3/9/2021	1.626%	1.413%	10,000,000.00	10,099,780.00	9,993,600.00	SUNGARD	1.177
IADB NOTE (170)	4581X0CS5	3/6/2019	3/15/2021	1.875%	2.633%	25,000,000.00	24,628,850.00	25,051,750.00	SUNGARD	1.192
IBRD NOTE (170)	459058FH1	5/24/2016	5/24/2021	1.376%	1.376%	10,000,000.00	9,980,400.00	9,961,900.00	SUNGARD	1.387
IBRD NOTE (170)	459058FH1	6/17/2016	5/24/2021	1.376%	1.376%	10,000,000.00	10,030,300.00	9,961,900.00	SUNGARD	1.387
IBRD NOTE (45)	459058FH1	5/6/2019	5/24/2021	1.376%	2.389%	25,000,000.00	24,496,250.00	24,904,750.00	SUNGARD	1.387
IBRD NOTE (170)	45905UXP4	7/26/2016	7/26/2021	1.300%	1.305%	10,000,000.00	9,997,500.00	9,931,500.00	SUNGARD	1.550
IADB NOTE (170)	4581X0CV8	9/16/2016	9/14/2021	1.250%	1.439%	20,000,000.00	19,818,800.00	19,862,800.00	SUNGARD	1.684
IBRD NOTE (85)	459058DY6	2/15/2017	2/10/2022	1.626%	2.177%	20,000,000.00	19,481,600.00	19,981,800.00	SUNGARD	2.068
IBRD NOTE (170)	45905UH23	4/27/2017		1.930%	1.942%	20,000,000.00	19,989,000.00	19,989,000.00	SUNGARD	2.275
IADB NOTE (170)	4581X0DA3	1/18/2018	1/18/2023	2.500%	2.482%	20,000,000.00	20,016,840.00	20,476,000.00	SUNGARD	2.920
IADB NOTE (170)	4581X0DA3	2/16/2018	1/18/2023	2.500%	2.788%	20,000,000.00	19,736,200.00		SUNGARD	2.919
IBRD NOTE (170)	45905UT53	3/20/2018	3/8/2023	2.720%	2.824%	20,000,000.00	19,904,260.00	20,606,800.00	SUNGARD	3.048
IBRD NOTE (45)	459058FF5	5/11/2018	4/19/2023	1.750%	2.941%	20,000,000.00	18,912,000.00	20,039,800.00	SUNGARD	3.208
IFC NOTE (170)	45950VLV6	4/20/2018	4/20/2023	2.826%	2.826%	20,000,000.00	20,000,000.00		SUNGARD	3.160
IADB NOTE (45)	45818WBW5	6/22/2018	6/15/2023	2.976%	2.976%	20,000,000.00	20,000,000.00	20,790,200.00	SUNGARD	3.305
IADB NOTE (170)	45818WBX3	7/26/2018	7/20/2023	2.870%	2.965%	20,000,000.00	19,912,860.00	20,743,600.00	SUNGARD	3.360
IFC NOTE (170)	45950KCP3	8/28/2018	7/31/2023	2.875%	2.869%	20,000,000.00	20,005,580.00	20,788,400.00	SUNGARD	3.390
IADB NOTE (170)	45818WBY1	9/11/2018	8/16/2023	2.960%	2.946%	20,000,000.00	20,012,400.00		SUNGARD	3.427
IBRD NOTE (170)	459058GL1	10/9/2018	9/27/2023	3.000%	3.187%	20,000,000.00	19,829,440.00	20,938,000.00	SUNGARD	3.537
IADB NOTE (170)	4581X0DF2	2/22/2019	1/16/2024	2.625%	2.640%	20,000,000.00	19,986,000.00	20,676,200.00		3.815
IBRD NOTE (170)	459058GQ0	3/29/2019	3/19/2024	2.500%	2.307%	20,000,000.00	20,180,700.00		SUNGARD	4.002
IADB NOTE (170)	45818WCJ3	4/12/2019	4/9/2024	2.375%	2.401%	20,000,000.00	19,975,940.00	20,526,400.00	SUNGARD	4.067
IABD NOTE (170)	45818WCJ3	5/23/2019	4/9/2024	2.375%	2.326%	20,000,000.00	20,044,360.00	20,526,400.00	SUNGARD	4.067
TOTAL SUPRANATIONALS				2.250%	2.471%	660,000,000.00	655,913,586.25	667,853,450.00		2.003
				2.23070	, _/.	15.00%	14.94%	15.13%		2.005
						13:30/0	1	13.13/0		

DESCRIPTION	CUSIP	<u>PURCHASE</u> <u>DATE</u>	<u>MATURITY</u> <u>DATE</u>	<u>INTEREST</u> <u>RATE</u>	<u>TRADING</u> <u>YIELD</u>	PAR VALUE	BOOK VALUE	MARKET VALUE	<u>SOURCE</u>	<u>DURATION</u> (YEARS)
CP-TOYOTA MOTOR (270)	89233GA22	8/8/2019	1/2/2020	2.020%	2.037%	20,000,000.00	19,835,033.33	19,999,055.56	SUNGARD	0.005
CP-BK OF MONTREAL (45)	06366GA25	8/20/2019	1/2/2020	1.900%	1.914%	65,000,000.00	64,536,875.00	64,996,930.56	SUNGARD	0.005
CP-BK OF MONTREAL (45)	06366GA33	8/20/2019	1/3/2020	1.900%	1.914%	20,000,000.00	19,856,444.44	19,998,111.11	SUNGARD	0.008
CP-TOYOTA MOTOR (270)	89233GA30	8/23/2019	1/3/2020	2.010%	2.025%	15,000,000.00	14,888,612.50	14,998,583.33	SUNGARD	0.008
CP-CHEVRON CORP (4)	16677JA63	9/3/2019	1/6/2020	1.950%	1.963%	55,000,000.00	54,627,604.17	54,987,013.89	SUNGARD	0.016
CP-TOYOTA MOTOR (270)	89233GA89	8/15/2019	1/8/2020	1.970%	1.986%	40,000,000.00	39,680,422.22	39,986,777.78	SUNGARD	0.022
CP-CHEVRON CORP (4)	16677JA97	9/3/2019	1/9/2020	1.950%	1.964%	25,000,000.00	24,826,666.67	24,990,555.56	SUNGARD	0.025
CP-CHEVRON (4)	16677JAA4	9/5/2019	1/10/2020	1.940%	1.953%	70,000,000.00	69,520,927.78	69,970,250.00	SUNGARD	0.027
CP-CANADIAN IMP (25)	13607EAD1	8/12/2019	1/13/2020	1.980%	1.997%	30,000,000.00	29,745,900.00	29,983,000.00	SUNGARD	0.036
CP-EXXON MOBIL (4)	30229AAQ2	9/27/2019	1/24/2020	1.940%	1.953%	30,000,000.00	29,807,616.67	29,967,416.67	SUNGARD	0.066
CP-EXXON MOBIL (4)	30229AAQ2	10/4/2019	1/24/2020	1.900%	1.911%	35,000,000.00	34,793,111.11	34,961,986.11	SUNGARD	0.066
CP-CANADIAN IMP (0025)	13607EAV1	11/27/2019	1/29/2020	1.820%	1.826%	50,000,000.00	49,840,750.00	49,933,888.89	SUNGARD	0.079
CP-TOYOTA (270)	89233GAW6	9/17/2019	1/30/2020	2.060%	2.076%	24,000,000.00	23,814,600.00	23,967,133.33	SUNGARD	0.082
CP-TORONTO DOMINION (20)	89116EAW3	9/19/2019	1/30/2020	2.040%	2.055%	20,000,000.00	19,849,266.67	19,972,611.11	SUNGARD	0.082
CP-BANK OF MONTREAL (45)	06366GAW9	9/19/2019	1/30/2020	2.000%	2.015%	25,000,000.00	24,815,277.78	24,965,763.89	SUNGARD	0.082
CP-TOYOTA MOTOR (270)	89233GB54	10/9/2019	2/5/2020	1.910%	1.922%	26,000,000.00	25,835,846.11	25,957,027.78	SUNGARD	0.099
CP-JP MORGAN (23)	46640PB77	10/17/2019	2/7/2020	1.900%	1.911%	50,000,000.00	49,701,805.56	49,912,638.89	SUNGARD	0.104
CP-EXXON MOBIL (260)	30229ABA6	10/18/2019	2/10/2020	1.820%	1.831%	45,000,000.00	44,738,375.00	44,915,000.00	SUNGARD	0.112
CP-ING US FUNDING (0023)	4497W0BJ6	10/22/2019	2/18/2020	1.890%	1.902%	30,000,000.00	29,812,575.00	29,932,000.00		0.134
CP-ING US FUNDING (0004)	4497W0BL1	10/23/2019	2/20/2020	1.890%	1.902%	20,000,000.00	19,874,000.00	19,952,777.78	SUNGARD	0.140
CP-ING US FUNDING (0004)	4497W0BM9	10/24/2019	2/21/2020	1.890%	1.902%	30,000,000.00	29,811,000.00	29,927,750.00		0.142
CP-JP MORGAN (0023)	46640PBR3	11/4/2019	2/25/2020	1.850%	1.861%	25,000,000.00	24,854,826.39	24,935,069.44		0.153
CP-TORONTO DOMINION (0020)	89116EC50	11/1/2019	3/5/2020	1.750%	1.761%	25,000,000.00	24,848,090.28	24,921,777.78		0.178
CP-TORONTO DOMINION (0020)	89116EC68	11/8/2019	3/6/2020	1.750%	1.760%	30,000,000.00	29,826,458.33	29,904,666.67		0.181
CP-BANK OF MONTREAL (0045)	06366GC98	11/13/2019	3/9/2020	1.790%	1.800%	20,000,000.00	19,883,650.00	19,933,511.11		0.189
CP-TORONTO DOMINION (0020)	89116ECA9	11/13/2019	3/10/2020	1.750%	1.760%	10,000,000.00	9,942,638.89	9,966,266.67		0.192
CP-CANADIAN IMP (0025)	13607ECG2	11/15/2019	3/16/2020	1.680%	1.690%	25,000,000.00	24,857,666.67	24,908,333.33		0.208
CP-JP MORGAN (0023)	46640PCJ0	11/18/2019	3/18/2020	1.840%	1.851%	30,000,000.00	29,814,466.67	29,887,066.67		0.214
CP-CANADIAN IMP (0025)	13607ECL1	12/12/2019	3/20/2020	1.750%	1.758%	15,000,000.00	14,927,812.50	14,942,066.67		0.219
CP-EXXON MOBIL (0170)	30229ACP2	12/12/2019	3/23/2020	0.000%	1.678%	25,000,000.00	24,881,708.25	24,899,777.78		0.227
CP-TORONTO DOMINION (0020)	89116ED18	11/19/2019	4/1/2020	1.790%	1.802%	20,000,000.00	19,866,744.44	19,906,472.22		0.252
CP-TORONTO DOMINION (0020)	89116ED18	11/20/2019	4/1/2020	1.800%	1.812%	25,000,000.00	24,833,750.00	24,883,090.28		0.252
CP-TORONTO DOMINION (0020)	89116ED18	11/21/2019	4/1/2020	1.800%	1.812%	20,000,000.00	19,868,000.00	19,906,472.22		0.252
CP-TORONTO DOMINION (0020)	89116ED18	12/2/2019	4/1/2020	1.850%	1.862%	25,000,000.00	24,844,548.61	24,883,090.28		0.252
CP-CANADIAN IMP (0025)	13607ED22	12/2/2019	4/2/2020	1.740%	1.750%	35,000,000.00	34,793,616.67	34,834,527.78		0.255
CP-BANK OF MONTREAL (0045)	06366GE13	12/4/2019	5/1/2020	1.785%	1.789%	10,000,000.00	9,926,120.83	9,938,155.56		0.334
CP-EXXON MOBIL (0004)	30229AE13	12/5/2019	5/1/2020	1.700%	1.712%	40,000,000.00	39,720,444.44	39,752,622.22		0.334
CP-TOYOTA MOTOR (0270)	89233GE44	12/3/2019	5/4/2020	1.850%	1.865%	35,000,000.00	34,724,812.50	34,778,177.78		0.342
CP-EXXON MOBIL (0004)	30229AE54	12/5/2019	5/5/2020	1.700%	1.712%	35,000,000.00	34,748,777.78		SUNGARD	0.345
CP-TOYOTA MOTOR (0270)	89233GE69	12/5/2019	5/6/2020	1.840%	1.855%	20,000,000.00	19,843,600.00	19,871,200.00		0.348
CP-BANK OF MONTREAL (0045)	06366GE70	12/6/2019	5/7/2020	1.745%	1.758%	50,000,000.00	49,629,187.50	49,675,444.44		0.350
CP-TORONTO DOMINION (0020)	89116EEB5	12/6/2019	5/11/2020	1.830%	1.845%	15,000,000.00	14,880,287.50	14,899,566.67	SUNGARD	0.361

DESCRIPTION	CUSIP	<u>PURCHASE</u> DATE	MATURITY DATE	INTEREST RATE	<u>TRADING</u> YIELD	PAR VALUE	BOOK VALUE	MARKET VALUE	SOURCE	<u>DURATION</u> (YEARS)
		DATE	DATE	NATE						(TLANS)
CP-TOYOTA MOTOR (0270)	89233GEF9	12/9/2019	5/15/2020	1.850%	1.865%	15,000,000.00	14,878,208.33	14,896,500.00	SUNGARD	0.372
CP-TORONTO DOMINION (0020)	89116EEJ8	12/11/2019	5/18/2020	1.850%	1.865%	15,000,000.00	14,877,437.50	14,894,200.00		0.381
CP-BANK OF MONTREAL (0045)	06366GEJ4	12/11/2019	5/18/2020	1.840%	1.855%	15,000,000.00	14,878,100.00	14,894,200.00		0.381
CP-TOYOTA MOTOR (0270)	89233GEK8	12/13/2019	5/19/2020	1.860%	1.875%	15,000,000.00	14,877,550.00	14,893,433.33		0.383
CP-ING US FUNDING (0170)	4497W0EL8	12/13/2019	5/20/2020	1.900%	1.915%	15,000,000.00	14,878,875.00	14,892,666.67		0.385
	4497 WOLLO	12/19/2019	5/20/2020	1.90078	1.91370	15,000,000.00	14,878,875.00	14,892,000.07	JUNUARD	0.380
TOTAL COMMERCIAL PAPER DISC				1.828%	1.871%	1,335,000,000.00	1,326,120,089.09	1,331,151,016.70		0.161
						30.34%	30.21%	30.16%		
CD-US BANK (240)	90333VU40	9/6/2019	1/14/2020	1.970%	1.970%	35,000,000.00	35,000,000.00	35,003,115.10	SUNGARD	0.038
CD-US BANK (240)	90333VU57	9/12/2019	1/16/2020	1.960%	1.960%	20,000,000.00	20,000,000.00	20,001,950.85	SUNGARD	0.044
CD-US BANK (240)	90333VU73	9/16/2019	1/30/2020	1.990%	1.990%	30,000,000.00	30,000,000.00	30,006,237.59	SUNGARD	0.082
CD-SVENSKA (120)	86959RBZ2	9/19/2019	1/30/2020	2.045%	2.040%	30,000,000.00	30,000,550.02	30,007,610.97	SUNGARD	0.082
CD-RB OF CANADA (260)	78012URA5	9/23/2019	1/31/2020	2.020%	2.020%	110,000,000.00	110,000,000.00	110,026,519.64	SUNGARD	0.085
CD-SKANDINAVISKA (120)	83050PDM8	8/28/2019	2/3/2020	1.970%	1.970%	40,000,000.00	40,000,000.00	40,008,605.56	SUNGARD	0.093
CD-RABOBANK (280)	21684XCQ7	9/30/2019	2/3/2020	2.020%	2.020%	45,000,000.00	45,000,000.00	45,011,925.96	SUNGARD	0.093
CD-RABOBANK (280)	21684XCS3	10/2/2019	2/4/2020	1.990%	1.990%	50,000,000.00	50,000,000.00	50,012,199.99	SUNGARD	0.096
CD-RABOBANK (280)	21684XCV6	10/7/2019	2/7/2020	1.950%	1.950%	45,000,000.00	45,000,000.00	45,010,053.29	SUNGARD	0.104
CD-US BANK (0240)	90333VV49	10/28/2019	2/13/2020	1.790%	1.790%	15,000,000.00	15,000,000.00	15,000,996.96	SUNGARD	0.120
CD-SKANDINAVISKA (0120)	83050PFL8	10/25/2019	3/2/2020	1.890%	1.890%	50,000,000.00	50,000,000.00	50,013,214.40	SUNGARD	0.170
CD-US BANK (0240)	90333VV64	10/31/2019	3/2/2020	1.760%	1.760%	25,000,000.00	25,000,000.00	25,001,066.36		0.170
CD-SKANDINAVISKA (0120)	83050PFU8	10/31/2019	3/2/2020	1.830%	1.830%	25,000,000.00	25,000,000.00	25,004,062.48		0.170
CD-SKANDINAVISKA (0120)	83050PFV6	11/1/2019	3/3/2020	1.820%	1.820%	55,000,000.00	55,000,000.00	55,008,132.79	SUNGARD	0.172
CD-US BANK (0240)	90333VV98	11/12/2019	3/6/2020	1.780%	1.780%	45,000,000.00	45,000,000.00	45,003,767.26	SUNGARD	0.181
CD-SVENSKA (0120)	86959RDG2	11/15/2019	3/11/2020	1.795%	1.790%	40,000,000.00	40,000,646.24	40,004,798.38		0.194
CD-US BANK (0240)	90333VX70	12/12/2019	3/20/2020	1.740%	1.740%	20,000,000.00	20,000,000.00	20,000,372.40		0.219
CD-SVENSKA HANDEL (0120)	86959RDS6	12/2/2019	4/3/2020	1.805%	1.800%	45,000,000.00	45,000,764.05	44,999,107.48	SUNGARD	0.257
CD-SVENSKA HANDEL (0120)	86959RDV9	12/3/2019	4/6/2020	1.795%	1.790%	60,000,000.00	60,001,035.23	59,997,180.23	SUNGARD	0.266
CD-FIVE STAR BK (CRA)		4/25/2019	4/23/2020	2.450%	2.450%	5,000,000.00	5,000,000.00	5,009,586.89	SUNGARD	0.312
CD-EAST WEST BK (CRA)		4/25/2019	4/25/2020	2.750%	2.750%	10,000,000.00	10,000,000.00	10,029,005.93		0.318
CD-RABOBANK (0280)	21684XDN3	12/4/2019	5/1/2020	1.820%	1.820%	40,000,000.00	40,000,000.00	40,001,014.42	SUNGARD	0.334
CD-BANK OF THE WEST (CRA)		5/10/2019	5/8/2020	2.500%	2.500%	10,000,000.00	10,000,000.00	10,023,514.04	SUNGARD	0.353
CD-ROYAL BK OR CANADA (0260)	78012URW7	12/6/2019	5/15/2020	1.820%	1.820%	80,000,000.00	80,000,000.00	80,002,315.02		0.372
CD-US BANK (0240)	90333VX47	12/6/2019	5/15/2020	1.730%	1.730%	20,000,000.00	20,000,000.00	19,993,833.42	SUNGARD	0.372
CD-SKANDINAVISKA ENSKIL (0120)	83050PGZ6	12/9/2019	5/15/2020	1.830%	1.830%	25,000,000.00	25,000,000.00	25,001,686.19	SUNGARD	0.372
CD-CANADIAN IMPERIAL (0025)	13606C3U6	12/10/2019	5/15/2020	1.770%	1.770%	55,000,000.00	55,000,000.00	54,991,359.67	SUNGARD	0.372
CD-SVENSKA HANDEL (0120)	86959RDZ0	12/10/2019	5/15/2020	1.805%	1.800%	25,000,000.00	25,000,540.89	24,999,352.22		0.372
CD-ROYAL BK OF CANADA (0260)	78012USL0	12/17/2019	5/29/2020	1.850%	1.850%	25,000,000.00	25,000,000.00	25,004,000.85		0.411
CD-RABOBANK (0280)	21684XDP8	12/17/2019	5/29/2020	1.840%	1.840%	35,000,000.00	35,000,000.00	35,004,154.79		0.411
· ·										
TOTAL CERT. OF DEPOSIT/THRIFT NOTES				1.894%	1.893%	1,115,000,000.00	1,115,003,536.43	1,115,180,741.13		0.209
						25.34%	25.40%	25.26%		

COUNTY OF SACRAMENTO SHORT-TERM INVESTMENT PORTFOLIO POOLED FUNDS AS OF 12/31/2019

DESCRIPTION	CUSIP	<u>PURCHASE</u> <u>DATE</u>	MATURITY DATE	INTEREST	<u>TRADING</u> <u>YIELD</u>	PAR VALUE	BOOK VALUE	MARKET VALUE	<u>SOURCE</u>	DURATION (YEARS)
CD-UMPQUA BANK (CRA)		4/23/2019	4/23/2020	2.800%	2.800%	5,000,000.00	5,000,000.00	4,971,593.06	SUNGARD	0.312
TOTAL CD-ACT OVER 365/366				2.800%	2.800%	5,000,000.00 0.11%	5,000,000.00 0.11%	4,971,593.06 0.11%		0.312
LAIF POOL		7/31/1997	1/31/2020	2.103%	2.103%	65,000,000.00	65,000,000.00	65,000,000.00	BOOK	0.085
TOTAL PASSBOOK ACCOUNTS				2.103%	2.103%	65,000,000.00 1.48%	65,000,000.00 1.48%	65,000,000.00 1.47%		0.085
	Grand Total		-	1.968%	1.987%	4,399,947,866.44	4,390,056,624.52	4,414,274,467.33		0.904



Department of Finance BEN LAMERA, DIRECTOR OF FINANCE POOLED INVESTMENT FUND

Monthly Review — December 2019

\$65,000,000

PORTFOLIO COMPLIANCE

Based on the Director of Finance Review Group Month-End Report, the entire portfolio was in *full compliance* with the Sacramento County Annual Investment Policy for the Pooled Investment Fund for Calendar Year 2019 and California Government Code.¹

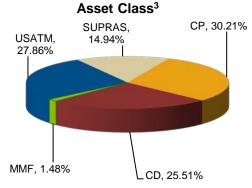
PORTFOLIO STATISTICS

Portfolio's Month-End Balance	\$4,390,056,625
Earned Income Yield for the Month	2.006%
Weighted Average Maturity (Days)	340
Estimated Duration (Years)	0.904
Amortized Book Value	\$4,392,057,123
Month-End Market Value	\$4,414,274,467
Percent of Market to Book Value ²	100.51%

Investment Objectives

- Safety of Principal
- Liquidity
- Public Trust
- Maximum Rate of Return

Percentage Portfolio Structure by



US Agency Notes Breakdown Percent of Portfolio at Cost ³								
FFCB Notes/Discount Notes	7.96%							
FHLB Notes/Discount Notes	13.10%							
FNMA Notes/Discount Notes	3.63%							
FHLMC Notes/Discount Notes	2.37%							
Total US Agency Notes	27.06%							

PORTFOLIO STRUCTURE³

State Treasurer's Office (LAIF)

External third party Investment Manager(s) at month end:

Investment Description	Portfolio at Cost	Yield at Month End
US Agency, Treasury & Municipal Notes (USATM):		
US Agency Notes	27.06%	1.916%
US Treasury Notes	0.00%	0.00%
Municipal Notes	0.80%	2.326%
Total USATM	27.86%	1.928%
Supranationals (SUPRAS)	14.94%	2.471%
Commercial Paper (CP)	30.21%	1.871%
Certificates of Deposit (CD)	25.51%	1.897%
LAIF/Money Market Funds (MMF)	1.48%	2.103%
Repurchase Agreements (REPO)	0.00%	0.000%

¹ This monthly review complies with all of the elements required by California Government Code §53646(b), with the exception of a detailed listing of each investment. A complete copy of the *Quarterly Pooled Investment Fund Report*, including a detailed listing of each investment, is available on the Department of Finance, Investment Division Web page at <u>https://finance.saccounty.net/Investments/Pages/RptQuartly.aspx</u>.

² Percent of market to book value is calculated using amortized book value. The GASB 31 fair value reported in the CAFR is calculated using the book value at purchase.

³ Percentages may not add up to totals due to rounding

YIELD HISTORY

The earned income yield history represents gross yields; **costs have not been deducted**. The investment management costs in prior years and this year continue to be approximately 10 basis points or 0.10%. The quarterly apportionment of earnings to participating funds will be made on a **cash basis** (as opposed to an accrual basis) for the first three quarters of the fiscal year. Earnings to participating funds will be annualized over the fiscal year based on a fund's cumulative average daily cash balance at each quarter end and fiscal year end. At fiscal year end (fourth quarter), the earnings of the pool will be converted to an accrual basis for the fourth quarter earnings' allocation.

Earned Income Yield Over Last 12 Months

YIELD TRENDS⁴

Earne	d Income History	Yield	2.75%	/0											
MONTH	POOL	LAIF	2.50%												
Dec-18	2.36%	2.29%	2.50%	/0											
Jan-19	2.43%	2.36%				0									
Feb-19	2.56%	2.39%													
Mar-19	2.49%	2.44%	2.25%	%											
Apr-19	2.52%	2.45%													
May-19	2.47%	2.45%													ō
Jun-19	2.46%	2.43%	2.00%	~											
Jul-19	2.38%	2.38%	1												
Aug-19	2.31%	2.34%													
Sep-19	2.28%	2.28%	1.75%	%											
Oct-19	2.17%	2.19%		Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19 -	Sep-19	Oct-19	Nov-19.
Nov-19	2.12%	2.10%		Ğ	Ъ	Fe	M	AF	Ma	ŋ	-	Au	Se	Ŏ	Ž
Dec-19	2.01%	2.04%	1						• • ••••••••••••••••••••••••••••••••••	DOL •		AIF			

CASH FLOW PROJECTION

The Pooled Investment Fund cash requirements are based on a 14-month historical cash flow model. The model has been adjusted for expected non-reoccurring participant liquidity needs. This projection, updated on January 13, 2019, is sufficient to meet cash flow expenditures for the next six months.

Month	Beginning Bank Balance	Receipts & Maturities	Disbursements	Difference	Less Investments Beyond 1 year	Funds Available to Invest for Future Cash Flow Needs ⁵				
Dollar amounts represented in millions										
Jan	20.0	\$1,538.1	\$1,031.1	\$507.0	\$45.0	\$462.0				
Feb	20.0	\$1,035.3	\$704.4	\$330.9	\$45.0	\$285.9				
Mar	20.0	\$1,345.2	\$759.5	\$585.7	\$45.0	\$540.7				
Apr	20.0	\$1,474.9	\$768.8	\$706.1	\$45.0	\$661.1				
May	20.0	\$1,241.4	\$940.1	\$301.3	\$45.0	\$256.3				
Jun	20.0	\$1,217.9	\$971.7	\$246.2	\$45.0	\$201.2				

If you have any questions about the Pooled Investment Fund, please call Chief Investment Officer Bernard Santo Domingo at (916) 874-7320 or Investment Officer Dave Matuskey at (916) 874-4251.

⁴ The earned income yield is the total net earnings divided by the average daily portfolio balance multiplied by 365 and then divided by the actual number of days in the month. The reported yield fluctuates based upon the number of days in the month, thus resulting in the anomaly of higher yields being reported for months with fewer days. February's yield is a prime example of such an anomaly.

⁵ Any excess net cash flow amounts in this column will be used to fund the negative cash flow positions in later months.



County of Sacramento

Inter-Departmental Memorandum

February 21, 2020

- To: Treasury Oversight Committee
- From: Bernard Santo Domingo

Subject: INVESTMENT APPROVED LISTS

Attached for your review is a report of the changes made to the Investment Approved Lists for the quarter ended December 31, 2019. The report reflects additions, deletions, and reaffirmations of investment providers for the following approved lists:

- Domestic Banks for All Legal Investments;
- Foreign Banks for All Legal Investments;
- Commercial Paper and Medium-Term Note Programs;
- Community Reinvestment Banks and Credit Unions;
- Firms for Purchase and Sale of Securities (Broker/Dealers and Direct Issuers); and
- Money Market Funds.

If you have any questions regarding these changes, please don't hesitate to call me at (916) 874-7320.

Changes to the Investment Approved Lists For the Quarter Ended December 31, 2019

Reaffirmed	Added ¹	Deleted
Dom	estic Banks for all Legal Investm	nents
For	eign Banks for all Legal Investm	ents
Skandinaviska Enskilda Banken AB		
Comme	rcial Paper & Medium-Term Note	lssuers
JP Morgan Securities LLC		
Community Rei	nvestment Act Approved Banks	& Credit Unions
Firms for Purchase a	nd Sale of Securities (Broker/De	alers & Direct Issuers)
	Money Market Funds	
	Money Market Funds	

¹ This company or fund satisfies the Annual Investment Policy of the Pooled Investment Fund's minimum credit rating requirement.

OVERVIEW OF POOLED INVESTMENT FUND STATISTICS FROM VARIOUS JURISDICTIONS FOR DECEMBER 2019.

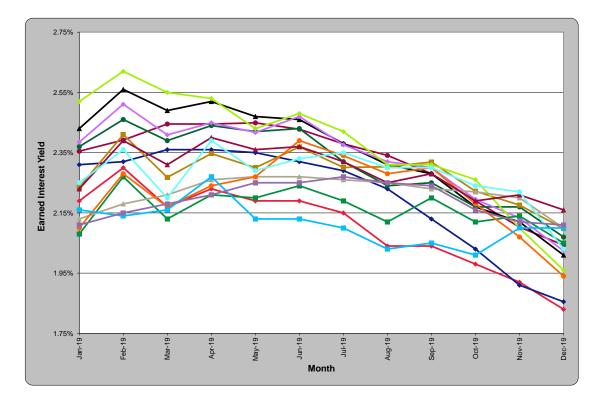
Investment Fund Statistics Questionnaire Results December 2019

Name of Fund	Earned Interest Yield	Portfolio Size (in millions)	Weighted Average Maturity (in days)	Percent Market Value
Sacramento County (Pooled)	2.01%	\$4,140.2	340	100.51%
Sacramento County (All)	2.15%	\$4,913.6	340	N/A
Local Agency Investment Fund (LAIF)	2.04%	\$26,711.9	226	100.18%
Contra Costa County (Pooled)	1.96%	\$3,386.3	227	100.35%
Contra Costa County (All)	1.98%	\$3,699.5	211	100.19%
Fresno County	2.05%	\$4,179.8	753	100.87%
Los Angeles County	1.83%	\$35,695.0	611	99.93%
Merced County	2.16%	\$1,070.8	533	100.43%
Nevada County	2.10%	\$185.4	892	100.88%
Orange County	1.94%	\$5,625.6	219	100.33%
Orange County (Schools)	2.00%	\$5,126.5	245	100.37%
Riverside County	1.86%	\$7,839.4	368	100.22%
San Bernardino County	2.04%	\$7,671.9	494	100.50%
San Diego County	2.07%	\$10,943.4	622	100.28%
San Francisco City and County	2.02%	\$12,325.6	447	100.30%
San Luis Obispo County	2.10%	\$1,139.7	298	100.41%
Solano County	2.03%	\$1,357.4	367	100.32%
Sonoma County (Pooled)	2.10%	\$2,712.1	751	100.07%
Sonoma County (All)	2.14%	\$2,734.7	768	100.65%

NOTE: When comparing performance returns, it is important to consider the cash flow needs of individual pool participants in relation to the objectives of each county's investment policy.

COMPARISON OF VARIOUS COUNTY POOLED INVESTMENT FUNDS AND LAIF 12-MONTH YIELD PERFORMANCE AS OF DECEMBER 2019

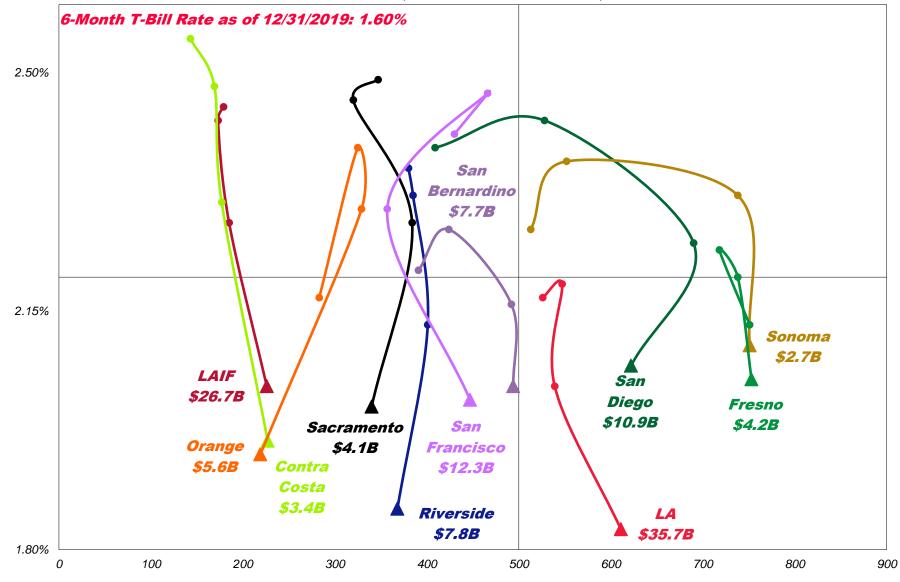
Jurisdiction	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
🔶 Contra Costa	2.52%	2.62%	2.55%	2.53%	2.43%	2.48%	2.42%	2.31%	2.31%	2.26%	2.10%	1.96%
Fresno	2.08%	2.27%	2.13%	2.21%	2.20%	2.24%	2.19%	2.12%	2.20%	2.12%	2.14%	2.05%
● LAIF	2.36%	2.39%	2.45%	2.45%	2.45%	2.43%	2.38%	2.34%	2.28%	2.19%	2.10%	2.04%
♦ Los Angeles	2.19%	2.30%	2.17%	2.23%	2.19%	2.19%	2.15%	2.04%	2.04%	1.98%	1.92%	1.83%
Merced	2.23%	2.39%	2.31%	2.40%	2.36%	2.37%	2.32%	2.25%	2.28%	2.19%	2.21%	2.16%
Nevada	2.16%	2.14%	2.16%	2.27%	2.13%	2.13%	2.10%	2.03%	2.05%	2.01%	2.10%	2.10%
Orange	2.10%	2.28%	2.17%	2.24%	2.27%	2.39%	2.34%	2.28%	2.30%	2.18%	2.07%	1.94%
Riverside	2.31%	2.32%	2.36%	2.36%	2.35%	2.32%	2.29%	2.23%	2.13%	2.03%	1.91%	1.86%
Sacramento	2.43%	2.56%	2.49%	2.52%	2.47%	2.46%	2.38%	2.31%	2.28%	2.17%	2.12%	2.01%
San Bernardino	2.15%	2.18%	2.21%	2.25%	2.25%	2.27%	2.25%	2.24%	2.16%	2.12%	2.11%	2.04%
San Diego	2.37%	2.46%	2.39%	2.44%	2.42%	2.43%	2.32%	2.24%	2.25%	2.17%	2.17%	2.07%
♦ San Francisco	2.39%	2.51%	2.41%	2.45%	2.42%	2.47%	2.38%	2.32%	2.30%	2.20%	2.13%	2.02%
🔺 San Luis Obispo	2.13%	2.18%	2.21%	2.26%	2.27%	2.27%	2.26%	2.25%	2.23%	2.22%	2.20%	2.10%
Solano	2.25%	2.36%	2.20%	2.39%	2.29%	2.33%	2.35%	2.30%	2.30%	2.24%	2.22%	2.03%
Sonoma	2.24%	2.41%	2.27%	2.35%	2.30%	2.37%	2.30%	2.30%	2.32%	2.22%	2.18%	2.10%



NOTE:

This graph is for illustration purposes only. When comparing performance returns, it is important to consider the cash flow needs of the individual pool fund participants in relation to the objectives of each county's investment policy.

Overview of Pooled Investment Fund Statistics from Various Jurisdictions Comparison of Yields and Average Weighted Maturities March 31, 2019 to December 31, 2019



Yield

Maturity in Days

COMMUNITY REINVESTMENT ACT PROGRAM.



Divisions Administration Auditor-Controller Consolidated Utilities Billing & Service Investments Tax Collection & Business Licensing Treasury

County of Sacramento

February 28, 2020

To: Banks Operating in Sacramento County

Subject: SACRAMENTO COUNTY COMMUNITY REINVESTMENT ACT PROGRAM

To encourage banks to be active in supporting the community, in 1992 the County of Sacramento Board of Supervisors adopted the Community Reinvestment Act (CRA) Program. The Board instructed the Director of Finance to design and implement a program to acknowledge and reward locally-active banks that support the community's credit needs.

The CRA Program authorizes the placement of public deposits from the County's Pooled Investment Fund in one-year, fixed-rate certificates of deposit with qualified banks that meets the credit needs of the community. This year, we have raised the maximum deposit per bank from \$10 million to \$20 million. The size of the deposit is dependent on the level of lending activity in low- and moderate-income neighborhoods in Sacramento County.

Qualified banks must have a Community Reinvestment Act rating of Satisfactory or better and offer a competitive yield. Credit rating requirements are waived for deposits covered by FDIC insurance, including deposits made through a placement service such as CDARS. For uninsured collateralized deposits, banks must have at least two of the following short-term ratings: A-2 by Standard & Poor's, P-2 by Moody's, and F2 by Fitch.

The CRA Program previously accepted applications from banks on a continuous basis, but with the recent addition of certificates of deposit purchased through a placement service such as CDARS, as an authorized investment for the Pooled Investment Fund, we now have an annual application period every March. You may apply for a CRA Program deposit with the enclosed application. Applications must be received by the County by **April 1, 2020**, and deposits are expected to be placed with qualified banks in April.

If you have any questions, please call Investment Officer, Dave Matuskey, at (916) 874-4251.

Sincerely,

Ben Lamera Director of Finance

Enclosure

FUTURE PRESENTATIONS TO THE TREASURY OVERSIGHT COMMITTEE.

NO WRITTEN REPORT

FPPC FORM 700 REMINDER.

NO WRITTEN REPORT

NEXT MEETING REMINDER – FRIDAY, MAY 15, 2020.

NO WRITTEN REPORT

ADJOURNMENT

NO WRITTEN REPORT