



RESOLUTION NO. 2026-161

A RESOLUTION OF THE COUNCIL OF THE CITY OF FRESNO, CALIFORNIA, TO ADOPT AN INVESTMENT POLICY FOR PUBLIC FUNDS FOR FISCAL YEAR 2026-2027

WHEREAS, the State Legislature has found that the solvency and creditworthiness of each local agency can impact the solvency and creditworthiness of the State and other local agencies in the State; and

WHEREAS, the State Legislature, to protect the solvency and creditworthiness of the State and all its political subdivisions, has declared that the deposit and investment of public funds by local officials and local agencies is an issue of Statewide concern; and

WHEREAS, the Government Code Sections governing investment of surplus and deposit of funds define “local agency” to include charter cities; and

WHEREAS, pursuant to Government Code Section 53646, the treasurer is encouraged, and in accordance with Fresno Municipal Code Section 7-104, the Controller of the City of Fresno (City) is required to annually render to the legislative body a statement of investment policy, which the legislative body shall consider and approve at a public meeting; and

WHEREAS, the City Controller, as the ex-officio Treasurer of the City, has prepared and submitted a statement of investment policy to the Council, the “2026-2027 City of Fresno Investment Policy,” attached hereto as Exhibit A, and incorporated herein by reference (Investment Policy); and

WHEREAS, pursuant to Government Code Sections 53607 and 53608, the Council of the City of Fresno (Council) may delegate its authority to invest or to reinvest



funds of the City, or to sell or exchange securities so purchased, to the Treasurer for one year, and may delegate its authority to deposit such securities for safekeeping to the Treasurer; and

WHEREAS, the Council has considered the submitted Investment Policy by the City Controller and the information presented to it at a public meeting.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Fresno as follows:

1. The Council hereby approves and adopts the submitted Investment Policy by the City Controller, as set forth in Exhibit A attached hereto.
2. Pursuant to Government Code Section 53607, the Council delegates its authority to invest or to reinvest funds of the City, or to sell or exchange securities so purchased, to the ex-officio Treasurer for one year, subject to the requirements of State Law and the Investment Policy.
3. Pursuant to Government Code Section 53608, the Council delegates its authority to deposit such securities for safekeeping to the ex-officio Treasurer.
4. This resolution shall be effective upon final approval.



* * * * *

STATE OF CALIFORNIA)
COUNTY OF FRESNO) ss.
CITY OF FRESNO)

I, AMY K. ALLER, City Clerk of the City of Fresno, certify that the foregoing resolution was adopted by the Council of the City of Fresno, at a regular meeting held on the 23rd day of June 2026.

AYES : Perea, Karbassi, Arias, Maxwell, Vang, Richardson, Esparza
NOES : None
ABSENT : None
ABSTAIN : None

Mayor Approval: June 26, 2026
Mayor Approval/No Return: N/A, 2026
Mayor Veto: N/A, 2026
Council Override Vote: N/A, 2026

AMY K. ALLER
City Clerk

By: Bernardo Chavez 7/8/2026
Deputy Date
BERNARDO CHAVEZ

APPROVED AS TO FORM:
ANDREW JANZ
City Attorney

By: Sukhman S. Sekhon 7/7/26
Sukhman S. Sekhon Date
Deputy City Attorney

Attachment: Exhibit A - Investment Policy for FY 2026-2027



2026-2027

City of Fresno

Investment Policy



Effective July 1, 2026

Santino Danisi
Controller/Finance Director/(ex-
officio)Treasurer



PREFACE

It is the Policy of the City of Fresno that, with due regard to the safety and risk of investment, all available funds shall be managed in conformance with these legal and administrative guidelines (“the Policy”). To the maximum extent possible, surplus funds shall be invested at the highest rates obtainable at the time of investment. Adequate operating funds shall be maintained in a depository institution(s) that provide both security for City funds and the liquidity necessary to meet the City’s cash receipt and disbursement needs.

The City recognizes that public sector treasury management operates within a rapidly evolving financial environment characterized by shifting interest rate conditions, emerging banking sector risks, operational technology vulnerabilities, and increasing cybersecurity threats. Accordingly, this Policy emphasizes prudent diversification, strong internal controls, operational resilience, and preservation of public trust.

Effective cash management is recognized as essential to good fiscal management. A conscientious cash management and investment policy will be adopted to meet the City’s financial obligations and take advantage of investment interest as available and material revenue for all operating and capital funds. The City’s Portfolio shall be designed and managed in a manner responsive to the public trust and consistent with State and local law.

The primary objectives of the City's investment program, listed in order of strict priority, are: (1) Preservation of principal and safety of capital; (2) Maintenance of sufficient liquidity to fund City operations; and (3) Optimization of return on investment consistent with objectives (1) and (2).

Consistent with applicable law and prudent portfolio management, the City may also support local financial institutions and community investment opportunities where such activities do not compromise the primary objectives of safety, liquidity, and yield.

Earnings from investments will be used in a manner that will best serve the interests of the citizens of Fresno.

(Note: A Glossary of cash management and investment terms is included in Appendix C.)



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EXECUTIVE SUMMARY



- Investments of surplus funds and deposits of operating funds by local agencies in California are primarily governed by State law, specifically Government Code (GC) Section 53600, et.seq.
- GC Section 53646 encourages, and Fresno Municipal Code (FMC) 7-104 requires that Council annually adopt a Policy applicable to City of Fresno investments of surplus funds and deposits of operating funds.
- The City shall comply with GAAP for governmental entities as promulgated by the GASB, including but not limited to GASB Statements 3, 31, 40, 72, and 79, and any subsequently issued or amended pronouncements applicable to the City's deposit, investment, and fiduciary reporting obligations.
- As stated in the Policy, the primary objectives of the City's investments program for surplus funds are (1) safety of capital (2) adequate liquidity and (3) optimization of return.
- Legal compliance is assured because the investments authorized for the City are either approved with the same parameters permitted by State law or have more stringent parameters. For example, State law has no limits on the number of Agency Notes. The City's Policy limits no more than 70 percent of the Portfolio to Agency Notes, with no more than 50 percent for any one issuer.
- Safety of capital is assured by managing financial credit risk (the risk of default by the issuer), custodial credit risk, (the risk of losing investments not held in the City's name), concentration of credit risk, (the risk of not adequately diversifying), interest rate risk (the risk of declines in market value when interest rates rise), and foreign currency risk (the risk of loss due to fluctuations in the value of foreign debt instruments.)
- Financial credit risk is managed by limiting investment choices to those authorized by State law. Custodial risk is managed by requiring a third-party custodian for all investments. Concentration of credit risk is managed by assuring adequate diversification as noted above, for example, with regard to Agency Notes. Interest rate risk is managed by limiting the portfolio to a weighted average maturity not to exceed three years. Foreign currency risk is managed by limiting investments to only dollar denominated instruments.
- Adequate liquidity is assured by maintaining an adequate balance of operating funds in the City's bank account, and with respect to surplus funds, by owning marketable securities which can easily be liquidated or sold, by maintaining a maturity schedule that assures a regular stream of cash flow, and by maintaining a sufficient amount of funds in immediately liquid accounts such as the Local Agency Investment Fund (LAIF).
- Investment return objectives are achieved by analysis of the market and the investments available, by maintaining an active style of investment management, by swapping bonds if advantageous, by requiring competitive bidding and negotiation when appropriate, and by engaging in securities lending if appropriate.



- The objective of local economic development is pursued by allowing up to \$15,000,000 of the Portfolio for purchases of Certificates of Deposit from local financial institutions.
- The cash management function is organized by the City (ex-officio) Treasurer (“the Treasurer”), who also serves as the City’s Controller. The Treasurer sets overall policy and objectives for the cash management program. The Principal Accountant and Treasury staff determine and take action to meet the City’s operating fund needs. If surplus funds are available, the Principal Accountant selects investments, with the approval of the Treasurer or Assistant Controller. One of the Treasury staff other than the Principal Accountant performs the accounting for the Portfolio and prepares monthly reports of investment activity. This segregation of duties is integral to strong internal control in the cash management program.
- The Treasurer shall maintain a standard operating procedures and a system of internal controls designed in a manner consistent with recognized control frameworks, including segregation of duties, dual authorization of wire transfers, independent reconciliation and price verification, approved settlement instructions, restricted system access, incident escalation procedures, and annual review of treasury controls and compliance. Such reviews may be performed by the Internal Audit section, external auditors, or other qualified independent parties. Additionally, Treasury procedures shall include controls designed to mitigate cyber, payment, and wire transfer fraud risks.
- The Principal Accountant, with the advice and direction of the Treasurer, performs the day-to-day management of the Portfolio. The markets and economic activity are monitored daily along with possible investments and actions that would benefit the Portfolio. Data is analyzed and investment decisions are made by the Principal Accountant and approved by the Treasurer or Assistant Controller.
- Reports of the results of the cash management program are made monthly. The Reports detail the disposition of all the City’s surplus funds and show the categories of the investments. Holdings in the Portfolio, including the par, book, and market value of each investment are also shown. The Reports also show the asset mix in the Portfolio, the range of maturities, and a comparison of earned interest for the current month and earned interest for the fiscal year to prior year numbers.
- After adoption of this Policy by Council, any material changes must be approved by Council.



I. INVESTMENT RESPONSIBILITIES

A. Legal Requirements

The primary sources of law regarding the investment practices and procedures for the City of Fresno are laws passed by the State of California, the Fresno City Charter, and the FMC. Federal law and Fresno County ordinances are not generally a source of direction with regard to the management of the City of Fresno deposit and investment program.

The State has declared its intention to govern investment and deposit activity for local agencies under various California GC Sections. GC Sections 53630.1 and 53600.6 state that: "The Legislature hereby finds that the solvency and creditworthiness of each individual local agency can impact the solvency and creditworthiness of the state and other local agencies within the state. Therefore, to protect the solvency and creditworthiness of the state and all its political subdivisions, the Legislature hereby declares that the deposit and investment of public funds by local officials and local agencies is an issue of statewide concern."

1. Investment Authority

a. State Law

GC Section 41001 identifies the city treasurer as the city official responsible for receiving and safekeeping all money received as treasurer. GC Section 41006 authorizes the city treasurer to appoint "deputies" for whose acts the treasurer and their bondsmen are responsible. GC Section 53601 authorizes the legislative body of a local agency to invest "surplus funds," money not required for the immediate needs of the local agency. Upon approval of the Investment Policy, the City Council shall, by resolution, delegate investment authority to the Treasurer for a period of twelve months pursuant to Government Code Section 53607.

b. City Law

Section 804 of the Charter of the City of Fresno creates the position of City Controller, who shall be appointed by the Chief Administrative Officer with the approval of the City Council. The Controller is to have charge of the financial affairs of the City under the Chief Administrative Officer.

Section 7-901 of the FMC appoints the Controller as the (ex-officio) Treasurer of the City and requires that all funds received by the City be promptly paid into the City's Treasury.

2. Investment Policy

a. State Law



GC Section 53646 encourages local agencies to prepare an annual investment policy to be submitted to the agency's legislative body for its consideration at a public meeting.

b. City Law

FMC Section 7-104 requires that the Controller shall annually prepare and submit an investment policy to the City Council for its approval. The policy is to include a policy statement, policy scope, policy objectives, and various other investment provisions addressing authorized investments, portfolio diversification, internal controls and other requirements as deemed appropriate by the Controller.

3. Investment Reporting

a. State Law

GC Section 53646 encourages that a quarterly investment report be prepared by the treasurer or chief financial officer and submitted to the City Council within 45 days following the end of the quarter covered by the report. These reports, shall include, at minimum: holdings by type, issuer, maturity, book value, par value, and market value; benchmark comparison; weighted average maturity and modified duration of the portfolio; identification of any outside-managed accounts or programs; a statement of portfolio compliance or noncompliance with this Investment Policy; a statement regarding the City's ability to meet expenditure requirements for the next six months; and the source of market valuations where required by law. These reporting requirements will be reflected in the monthly investment report.

GC 53607 requires that the treasurer make a monthly report of investment transactions to the City Council. The monthly report shall identify the source of market valuations for all Portfolio holdings. The source data provider shall be identified where market values are obtained from the City's investment accounting system and sources shall be disclosed in instances where values are obtained from broker-dealer or third-party pricing services.

b. City Law

Although there is no legal requirement set forth in the City Charter or the FMC to do so, the Treasurer of the City of Fresno follows State law and submits monthly reports of investment activity to the City Council, in accordance with Section VI.A. of this Policy within 30 days after the end of the month covered by the report or as soon thereafter as the month is closed and it is practicable.

4. Authorized Investments

a. State Law

GC Section 53601 establishes the types of investments allowed, the maximum allowable percentage limits for each investment type, acceptable maturities,



quality of ratings allowed, and maximum allowable percentage by issuer. GC Section 53601.8 provides for the investment of a portion of the City's surplus funds in certificates of deposit at a commercial bank, savings bank, savings and loan association, or credit union that uses a private sector entity that assists in the placement of certificates of deposit. In addition, GC 16429.1 authorizes local agencies like the City to invest money in the LAIF established by the State Treasurer for the benefit of local agencies.

b. City Law

The City Charter and municipal code do not deal with the types of investments permitted for the City of Fresno. Through this Policy, the City of Fresno conforms to State Law with regard to authorized investments. (See Section III.A.1. Also, Appendix D contains a comparison of State and City authorized investments).

c. Grandfather Clause

Any investment held by the City of Fresno at the time this Policy is adopted shall not be sold to conform to any part of this Policy unless its sale is judged to be prudent by the City Treasurer.

5. Collateral Requirements

a. State Law

There are no collateral requirements for investments of surplus funds held in the City's treasury in accordance with GC Section 53601. GC Section 53601.8 (c) requires that the full amount of principal and interest accrued on local agency funds invested in certificates of deposit in accordance with the provisions of GC Section 53601.8 shall at all times be insured by the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Administration (NCUA).

GC Section 53635.2 requires that funds not invested in accordance with GC Section 53601, should "as far as possible" be deposited in eligible financial institutions in California. This money constitutes the City's operating funds. For public operating funds in demand deposit accounts with financial institutions, GC Section 53652 requires that such funds must be collateralized by the institution with a market value of eligible securities listed in GC Section 53651, in excess of the total amount of all deposits secured by such eligible securities, by varying percentage amounts, depending on the type of security. Depository institutions are required to contribute such collateral to a pool of securities held in the name of and administered by the state-designated administrator, an official with the California Department of Financial Protection and Innovation (DFPI), and held by the Federal Reserve Bank as custodian.

b. City Law



FMC Section 7-101 governs the collection and custody of City moneys and requires all such funds to be paid promptly into the City's Treasury, for deposit into financial institutions as determined to be most advantageous to the City by the Controller, with the approval of the City Council.

6. Prudent Person Rule

a. State Law

GC Section 53600.3 identifies those who invest money on behalf of local agencies as trustees and therefore fiduciaries subject to the prudent investor standard. A trustee is required to survey general economic conditions and the anticipated needs of the agency, and act in accordance with a level of care, skill, prudence and diligence under the circumstances prevailing, in order to safeguard the principal of the investment and maintain the liquidity needs of the agency.

b. City Law

The City Charter and the FMC do not specifically address the requirement for City personnel engaged in the investment process to act in accordance with the prudent person rule. However, this Policy does require the Prudent Person standard of behavior with respect to the City's Portfolio. (See Section I.C.1.)

7. Investment Objectives

a. State Law

GC Section 53600.5 requires that a trustee investing public funds must have the following objectives with regard to investment activities in the priority stated: Safety of principal, (First priority), Liquidity needs of the local agency (Second priority), and a Return on the funds under his/her control (Third priority). Also, with regard to the Return on investments, GC Section 53601.6(b) prohibits a local agency from investing funds in any security that could result in a zero-interest accrual if held until maturity.

b. City Law

The City Charter and the FMC do not specifically note these requirements, but this Policy states that Safety, Liquidity and Yield constitute the first three objectives of the City's investment program. In addition, this Policy prohibits investing in any investment that could result in a zero-interest accrual. (See Section III.)

8. Securities Dealers

a. State Law

GC Section 53601.5 requires that any investments purchased by a local agency, must be obtained from either the issuer, or, if in the secondary market, from an institution licensed by the State as a broker-dealer, as defined in Section 25004 of



the Corporation Code, or from a member of a federally regulated securities exchange, from a national or state-chartered bank, from a savings association or federal association (as defined by Section 5102 of the Financial Code) or from a brokerage firm designated as a primary government dealer by the Federal Reserve Bank.

b. City Law

The Charter and the FMC do not directly cover the requirements for broker-dealers, but this Policy conforms to State Law with regard to those who wish to maintain a broker-dealer relationship with the City. (See Section V.C.)

9. Prohibited Investments

a. State Law

Government Code §53601.6(a) expressly prohibits investments in inverse floaters, range notes, and mortgage-derived interest-only strips. In addition, because Government Code §53601 limits local agencies to the instruments specifically authorized in that section, investments in exchange-traded funds (ETFs), real estate investment trusts (REITs), equity securities, and annuity contracts are also prohibited.

b. City Law

While the Charter and the FMC do not specifically deal with this issue, this Policy does conform to State Law and prohibits investment in inverse floaters, range notes, or mortgage-derived, interest-only strips. (See Section III.A.1.b.)

10. Trading Securities

a. State Law

GC Sections 53603, 53604, and 53605 collectively permit an investment strategy other than “buy and hold.” These Code sections allow the purchase of an investment when issued or in the market, after it has been issued, and they also permit selling or exchanging an investment prior to maturity, in order to raise capital for the original purpose of the investment, or as otherwise desired.

b. City Law

The Charter and the FMC do not discuss the circumstances under which investments will be bought and sold, but this Policy follows State Law in permitting the City to trade securities if it is advantageous to the City to do so and will not constitute a deviation from other Sections of this Policy. (See Sections III.C. and V.E.)

11. Safekeeping

a. State Law



GC Section 53608 permits the safekeeping function for a local agency to be delegated by the City Council to the City Treasurer. Securities may be deposited in a number of institutions including a Federal or State association (as defined by Section 5102 of the Financial Code), a trust company or a State or national bank located in California, with any branch of the Federal Reserve Bank, or with any State or national bank located in a (Federal) reserve city. By implication, what is not permitted is the deposit of securities with a “counterparty” or the broker-dealer from whom the securities were purchased.

b. City Law

Neither the Charter nor the FMC prescribe standards regarding the safekeeping of securities. However, this Policy conforms to State Law and requires City securities to be held by a third-party custodian. (See Section III.A.2.)

B. Scope

1. Applicability

a. Investment Pool

This Policy applies to all monies under the control of the Treasurer of the City of Fresno, normally used in the day-to-day operations of the City, or which are not required for immediate use. The former funds are defined herein as “operating funds.” The latter funds are referred to in GC Section 53601 as “surplus funds.” Operating funds shall be deposited in the City’s demand deposit account (checking account) with its depository institution, in accordance with Section I.A.5. of this Policy. The amount of funds kept on deposit in this account shall be determined by the Treasurer, and the Treasurer’s deputies, to meet the demands of the City’s daily operations. This practice meets the responsibility delegated to the Treasurer by the Fresno City Council, in accordance with Section I.A.1.a. and Section IV.B. of this Policy.

In meeting this same responsibility with respect to surplus funds, all such monies entrusted to the Treasurer will be pooled in a diversified portfolio (Investment Pool or the Portfolio). The City Treasurer and staff shall monitor economic and other relevant conditions and manage the Portfolio on an active basis.

b. Fund Accounting

The monies covered by this Policy are accounted for in the City’s General Ledger and reported in the City’s Annual Comprehensive Financial Report (ACFR). These financial assets are accounted for by means of fund accounting, in accordance with Generally Accepted Accounting Principles (GAAP) for Governmental entities. The Fund types used to account for them are:

- General Fund
- Special Revenue Funds
- Capital Projects Funds



- Enterprise Funds
- Internal Service Funds
- Fiduciary-Agency Funds

2. Exclusions

a. Deferred Compensation Funds

The assets and investments comprising the Deferred Compensation Fund are specifically excluded from coverage by this Policy. Investment of these funds is directed by each employee in accordance with the rules of the Deferred Compensation Plan of the City.

b. Successor Agency to the Redevelopment Agency of the City of Fresno

In addition, this Policy is not applicable to funds held by the Successor Agency to the Redevelopment Agency (RDA) of the City of Fresno. Although a component unit of the City of Fresno, the RDA administers its funds separately from the City and does not come under the authority of the City Treasurer.

c. Retirement Systems

Also excluded are all investments of the City of Fresno Retirement Systems, including the assets held in the General Employees System, and both Police and Fire Systems. These assets, both City and employee contributions, are governed by and are under the control of the Retirement Systems Board of Directors.

d. Bond or Loan Proceeds

Bond or other proceeds resulting from the City's indebtedness, held by a trustee on behalf of the City's creditors, or in accordance with federal requirements, typically to be used in conjunction with the construction of various capital projects, are also specifically excluded from the scope of this Policy. Furthermore, monies held by a trustee or fiscal agent and pledged to the payment or security of bonds or other indebtedness, known as "Reserve Funds," or obligations under a lease, installment sale, or other agreement of the City, or certificates of participation in those bonds, indebtedness, or lease installment sale, or other agreements are also excluded from the scope of this Policy. Pursuant to GC Section 53601(m), such funds may be invested in accordance with the statutory provisions governing the issuance of those bonds, indebtedness, or lease installment sale, or other agreement, or to the extent not inconsistent therewith or if there are no specific statutory provisions, in accordance with the ordinance, resolution, indenture, or agreement of the City in providing for the issuance, rather than through the application of this Policy.

C. Standards of Conduct

1. Prudent Investor Rule



The standard of prudence to be used by investment officials for the City of Fresno shall be the “prudent person” standard and shall be applied in the context of managing an overall portfolio. Per GC Section 53600.3, the “prudent person” standard states that “When investing, reinvesting, purchasing, acquiring, exchanging, selling or managing public funds, a trustee shall act with care, skill, prudence, and diligence under the circumstances then prevailing, including, but not limited to, the general economic conditions and the anticipated needs of the agency, that a prudent person acting in a like capacity and familiarity with those matters would use in the conduct of funds of a like character and with like aims, to safeguard the principal and maintain the liquidity needs of the agency.” Investment officers acting in accordance with written procedures and exercising due diligence shall be relieved of personal responsibility for an individual security’s credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and appropriate action is taken to control adverse developments.

All Treasury personnel involved in investment management shall annually: (a) acknowledge in writing their receipt of, and familiarity with, the Investment Policy and related procedures; (b) complete a minimum of eight hours of investment-related professional development, with documentation maintained by the Treasurer or designee; (c) ensure that new Treasury personnel complete the required ethics training within six months of assuming their duties, with ethics-training records retained for five years; and (d) appointed and elected officials shall complete the biennial two-hour fiscal and financial training required by Government Code Section 53238.

2. Ethical Standards

Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Officers and employees shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the City.

3. Conflicts of Interest, Gifts, Gratuities

The City fully supports the disclosure process required by the Political Reform Act and each individual involved in the City’s investment program shall be required to complete Form 700, Statement of Economic Interests, annually, in accordance with GC Sections 87100-87350. Employees and investment officers shall disclose any material financial interests in firms that conduct business within the City’s jurisdiction and shall further disclose any personal financial/investment positions that could be related to the performance of the City’s Portfolio. **The limit on gifts or gratuities from a single source during a single year shall be the applicable limit established by the California Fair Political Practices Commission (FPPC) under the Political Reform Act, as adjusted from time to time. As of the effective date of this Policy, that limit is \$630.** A single gift or multiple gifts from a single donor, whose value exceeds \$50 during a calendar year must be reported. All individuals are required to file Form 700 pursuant to this Policy shall do so electronically

through the FPPC's online filing system, as required by GC Section 87500(a)(2), as amended by SB 852.



II. INVESTMENT OBJECTIVES

A. Compliance with Legal and Professional Direction

In conducting its investment program, the City shall comply with all State and City legal directives, conform to GAAP as promulgated by the GASB, particularly GASB Statements 3, 31, 40, 72, and 79, and avail itself of guidance provided by governmental and industry professional organizations, including, but not limited to the California Debt and Investment Advisory Commission (CDIAC), the Government Finance Officers Association (GFOA), the California Municipal Treasurer's Association (CMTA), the California Society of Municipal Finance Officers (CSMFO), the Municipal Treasurers Association of the United States and Canada (MTAUS&C), the Association for Finance Professionals (AFP), and the Public Treasury Institute (PTI). It shall be the Policy of the City to ensure that staff involved in the investment program have regular training and adequate information resources provided by the preceding governmental and industry professional organizations. Investment decisions shall be based solely on prudent financial considerations consistent with this Policy, applicable law, the City's liquidity needs, and fiduciary responsibilities.

B. Safety of Capital

The City of Fresno's first and most important objective in conducting its investment program is to ensure the safety of principal, considering the portfolio as a whole. In a well-diversified portfolio, at any particular point in time, security valuations may be impacted either favorably or unfavorably by changes in interest rates and economic conditions. Specific policies to ensure the safety of principal are presented in Section III.A. "Policies to Ensure Legal Compliance and Safety of Principal."

C. Maintenance of Adequate Liquidity

The City's Portfolio must be structured in a manner that will provide the liquidity necessary to pay obligations as they become due. This is the second objective of the investment program. Specific policies by which the City ensures the maintenance of adequate liquidity are described in Section III.B. "Policies to Ensure Adequate Liquidity."

D. Return on Investments

The City shall seek to optimize return on investments, subordinate to the safety of principal and maintenance of adequate liquidity. This third objective of the City investment program shall be to achieve a rate of return on funds that is comparable to that achieved by LAIF. Specific policies regarding investment rate of return are presented in Section III.C. "Policies to Achieve Investment Return Objectives."

E. Supplementary Program- Local Development Program



Fourth, the City of Fresno seeks to promote local economic development through various programs and activities. Included is the Treasurer's program of placing funds with local financial institutions who demonstrate a commitment to private economic growth, local housing investment and other community services. While investment in local financial institutions may result in a lower net yield for the Portfolio, the benefit to be derived is a potential expansion of the City's tax base. Specific policies regarding local investments are presented in Section III.D, "Policies to Promote Local Economic Development."

III. INVESTMENT POLICIES

A. Policies to Ensure Legal Compliance and Safety of Principal

Ensuring compliance with State law and safety of principal are accomplished by minimizing three types of risk: credit risk, interest rate risk and foreign currency risk. There are three sub-types of credit risk: financial risk, custodial credit risk, and concentration of credit risk. Financial risk is the risk that the issuer of an investment instrument will default on it and not pay the debt. Custodial credit risk is the risk of losing an ownership interest in a security because it was held in the name of the selling firm in the transaction, and that firm experienced financial stress, making access to the security impossible. Concentration of credit risk refers to the risk of owning too many investments of one issuer. Interest rate risk is the risk of the loss of market value of an investment if interest rates should rise after the purchase. Foreign currency risk is the risk of the possible loss of an investment's value when it is converted from a foreign currency into U.S. dollars.

1. Managing Financial Credit Risk

a. Authorized Investments

The most effective method for minimizing the risk of default by an issuer is to invest in high quality obligations. Also, since these obligations are the only ones permitted by State law, investing in them is also the most effective way to maintain legal compliance. Therefore, it is the Policy of the City of Fresno to purchase only those obligations specified in GC Section 53601, GC Section 53601.8, and GC Section 16429.1. These are as follows:

- (1.) City of Fresno bonds, including revenue bonds, maturing within five years of the date of purchase. There shall be no percentage limitation of the Portfolio that can be invested in this category.
- (2.) United States Treasury notes, bonds, bills, or certificates of indebtedness, or those for which the faith and credit of the United States are pledged for the payment of principal and interest, maturing within five years of the date of purchase. There shall be no percentage limitation of the Portfolio that can be invested in this category.
- (3.) Registered California warrants, treasury notes or bonds, including revenue bonds maturing within five years of the date of purchase. There shall be no percentage limitation of the Portfolio that can be invested in this category.



- (4.) Registered treasury notes or bonds of any of the other 49 United States, in addition to California, including bonds payable solely out of the revenues from a revenue-producing property owned, controlled, or operated by a state or by a department, board, agency, or authority of any of the other 49 United States, in addition to California, maturing within five years of the date of purchase. There shall be no percentage limitation of the Portfolio that can be invested in this category.
- (5.) Bonds, notes, warrants or other evidence of indebtedness of any local agency within California, including bonds payable solely out of the revenues from a revenue-producing property owned, controlled, or operated by the local agency, or by a department, board, agency, or authority of the local agency, maturing within five years of the date of purchase. There shall be no percentage limitation of the Portfolio that can be invested in this category.
- (6.) Federal Agency or United States Government-Sponsored Enterprise obligations, participations, or other instruments including those issued by or fully guaranteed as to principal and interest by Federal agencies or United State Government-Sponsored Enterprises, maturing within five years of the date of purchase. These include, among others, issues of the Government National Mortgage Association (GNMA), the Federal Farm Credit Bank System (FFCB), the Federal Home Loan Bank System (FHFA), the Federal Home Loan Mortgage Corporation (FHLMC), the Federal National Mortgage Association (FNMA), and the Federal Housing Administration (FHA). According to the Government Code, there is no percentage limitation of the Portfolio that can be invested in this category. However, the City Policy is that no more than 70 percent of the City Portfolio shall be composed of investments in this category. Likewise, although the Government Code has no limitation on the percentage of the Portfolio that can be invested in any one of the issuers referenced in this paragraph, the Policy of the City of Fresno is to limit the percentage of the City's Portfolio that can be invested in any one of these issuers to 50 percent.
- (7.) Banker's Acceptances are bills of exchange or time drafts drawn on and accepted by a commercial bank. Banker's Acceptances may not exceed 180 days to maturity at the time of purchase. No more than 40 percent of the Portfolio may be invested in this category, with no more than 30 percent of the Portfolio invested in the obligations of any one bank. Only Banker's Acceptances eligible for purchase by the Federal Reserve System meet the eligibility requirements for investment in the Portfolio.
- (8.) Commercial paper must be rated "P-1" by Moody's Investors Service or "A-1" by Standard & Poor's, and must be issued by a domestic corporation with total assets exceeding \$500,000,000 and with "A" or better long-term debt ratings from Moody's or Standard & Poor's. Purchases of eligible commercial paper may not exceed 40 percent of the Portfolio and may not have a term to maturity greater than 397 days at the time of purchase and this is in effect until January 1, 2031 (GC 53601(h) as amended by SB 595



and SB 858). The City may not purchase more than 10 percent of the outstanding commercial paper of any single issuer.

The City qualifies for the 40 percent commercial paper limit as a local agency with \$100 million or more in investment assets under management, pursuant to Government Code §53601(h). However, the City's Investment Policy is more restrictive and limits commercial paper holdings to no more than 25 percent of the Portfolio. This 25 percent limit constitutes an absolute maximum and may not be exceeded without prior approval of the Policy amendment by the City Council.

- (9.) Negotiable Certificates of Deposit issued by nationally or State-chartered banks, savings associations, or a federal association (as defined by Section 5102 of the California Financial Code), a state or federal credit union, or by a state-licensed branch of a foreign bank, not to exceed the net equity of the financial institution, and not to exceed a total concentration of 30 percent of the Portfolio and maturing within five years of the date of purchase. These are not Time Deposits that would ordinarily be purchased from banks (See Section III.D.4. for information about the City's Time Deposit investments.) Also, Negotiable CDs cannot be purchased from institutions for which City investment officials serve as members of the governing board.
- (10.) Investments in repurchase agreements, reverse repurchase agreements, or securities lending agreements of any securities authorized by this Policy. The terms for repurchase agreements may not exceed one year, and the market value of the underlying securities must be maintained at a value of 102 percent or greater of the funds borrowed at all times during the agreement. For reverse repurchase agreements and securities lending agreements, each of the following conditions applies independently: (a) the securities to be sold or lent must have been owned and invested by the City for a minimum of 30 days prior to the transaction; (b) the total amount of reverse repurchase and securities lending agreements outstanding at any time shall not exceed 20 percent of the Portfolio; (c) no individual agreement shall exceed a term of 92 days, unless a guaranteed spread is in place covering the full term of the agreement; (d) borrowed funds shall not be reinvested for a period exceeding 92 days, unless a guaranteed spread covering the full reinvestment period is in place; and (e) all such transactions shall be conducted only pursuant to a written agreement approved by the City Attorney, as set forth in Section III.C.6 of this Policy. The annual Investment Policy adoption resolution submitted to City Council shall include, as applicable, a standing authorization for reverse repurchase and securities lending transactions pursuant to GC Section 53601(j), subject to all conditions and parameters of this Policy.
- (11.) Medium-term notes are all corporate and depository institution debt securities with a maximum of five years or less remaining to the date of maturity at the time of purchase, issued by corporations organized and operating within the United States or by depository institutions licensed by the United States or any state and operating within the United States. Notes



eligible for investment shall be rated in a rating category of “A” or better by a nationally recognized rating service. No more than 30 percent of the Portfolio may be invested in medium-term notes. Likewise, the State limits investments in the medium-term notes of a single issuer to no more than 30 percent of the Portfolio. However, this Policy further limits investment in the medium-term notes of any one issuer to no more than 20 percent of the Portfolio. The limit on the amount of a single issuer’s debt which may be purchased remains the same as that of the State, 100 percent.

- (12.) Shares of beneficial interest issued by diversified management companies, otherwise known as Mutual Funds, who invest in the securities and obligations authorized by this Policy. To be eligible for investment, these companies shall either: (1) attain the highest ranking or the highest letter and numerical rating provided by two of the largest nationally recognized rating services, or (2) have an investment adviser registered with the Securities and Exchange Commission with at least five years’ experience investing in the securities authorized by this Policy, and with assets under management in excess of \$500,000,000. Investment in any one Mutual Fund shall not exceed 10 percent of the Portfolio, while the total of all Mutual Fund investments shall not exceed 20 percent of the Portfolio. Also, the purchase price of shares shall not include any commission that the companies may charge.
- (13.) Shares of beneficial interest issued by diversified management companies that are Money Market Funds registered with the Securities and Exchange Commission under the Investment Company Act of 1940. To be eligible for investment, these companies shall either (1) attain the highest ranking or the highest letter and numerical rating provided by not less than two nationally recognized statistical rating organizations, or (2) retain an investment adviser registered or exempt from registration with the securities and Exchange Commission with not less than five years’ experience managing Money Market Mutual Funds with assets under management in excess of \$500,000,000. Investment in Money Market Funds shall not exceed 20 percent of the Portfolio and shall not include in the purchase price of shares any commission that the companies may charge.
- (14.) Any mortgage pass-through security, collateralized mortgage obligation, mortgage-backed or other pay-through bond, equipment lease-backed certificate, consumer receivable pass-through certificate, or consumer receivable-backed bond of a minimum of five years’ maturity at the time of purchase. Securities eligible for investment under this subdivision shall be issued by an issuer having an “A” or higher rating for the issuer’s debt as provided by a nationally recognized rating service and rated in a rating category of “AA” or its equivalent or better by a nationally recognized rating service. Purchase of securities authorized by this Policy may not exceed 20 percent of the Portfolio.
- (15.) Shares of beneficial interest issued by a joint powers authority organized pursuant to GC Section 6509.7 that invests in the securities and obligations



authorized in paragraphs (1.) to (14.), inclusive. Each share shall represent an equal proportional interest in the underlying pool of securities owned by the joint powers authority. To be eligible under this section, the joint powers authority issuing the shares shall have retained an investment advisor that meets all of the following criteria: (i) the adviser is registered or exempt from registration with the Securities and Exchange Commission (ii) the adviser has not less than five years of experience investing in the securities and obligations authorized in paragraphs (1.) to (14.), inclusive, and (iii) the adviser has assets under management in excess of five hundred million dollars (\$500,000,000). In accordance with State Law, there are no limits on the percentage of the Portfolio that may be invested in these shares.

- (16.) Deposits made with a “selected” depository institution, in accordance with GC Section 53601.8, that uses a private entity that assists in the placement of certificates of deposit with one or more commercial banks, savings banks, savings and loan associations, or credit unions. Such deposits shall at all times be insured by the Federal Deposit Insurance Corporation or the National Credit Union Administration. The selected depository institution shall serve as custodian for each certificate of deposit that is issued with placement service for the local agency’s account.

Deposits placed pursuant to Government Code Section 53601.8 shall comply with all statutory conditions in effect at the time of investment, including the maximum percentage limitation applicable to such deposits, full FDIC or NCUA insurance, monthly inventory reporting of all placements, and procedures to prevent aggregate deposits at any depository institution from exceeding federal insurance limits.

- (17.) Deposits in LAIF are permitted up to the maximum amount authorized by the State Treasurer from time to time. The Treasurer shall monitor the applicable limit and adjust the City’s LAIF balances accordingly whenever the State Treasurer revises the maximum.

The City considers LAIF to be an external investment pool subject to the reporting requirements of GASB Statement 31, which requires that LAIF deposits be reported at fair market value.

- (18.) United States dollar denominated senior unsecured unsubordinated obligations issued or unconditionally guaranteed by the International Bank for Reconstruction and Development, International Finance Corporation, or Inter-American Development Bank, with a maximum remaining maturity of five years or less, and eligible for purchase and sale within the United States. Investments under this subdivision shall be rated “AA” or better by an NRSRO and shall not exceed 30 percent of the Portfolio.

b. Prohibited Investments

- (1.) The City shall not invest any funds in investment instruments not listed in Section III.A.1.a.



- (2.) The City shall not invest any funds in those investment instruments identified as “inverse floaters,” “range notes,” or “mortgage-derived, interest-only strips.”
- (3.) The City shall not invest any funds in any security that could result in zero interest accrual if held to maturity.

2. Managing Custodial Credit Risk

To protect against fraud, embezzlement, or potential losses resulting from the financial collapse of securities dealers, all securities owned by the City shall be held in the name of the City for safekeeping by a third-party bank trust department, acting as agent for the City under the terms of a custody agreement or professional services agreement, executed by the bank and the City. All securities will be purchased and delivered using standard delivery-versus-payment (DVP) procedures through the City’s safekeeping agent. No outside broker/dealer or advisor may have access to City funds, accounts or investments, and no direct transfers of funds to an outside broker/dealer are permitted. Only indirect transfers may be made, through the City’s safekeeping agent.

Upon purchase, sale, or maturity of investment securities, standing settlement instructions are provided to the servicing banks and broker/dealers involved in the transactions. Adherence to these standing settlement instructions ensures accurate and timely settlement of investment security transactions. Standing settlement instructions are restricted in nature, ensuring investment settlements are with established institutions.

Deposits with financial institutions, and with LAIF, in accordance with GC Section 53601.8, GC Section 53635.2 and GC Section 16429.1, shall be evidenced by a certificate or official statement of the City’s account, issued by the financial institution or by LAIF, and retained in possession of the City.

The Treasurer shall maintain written procedures addressing cybersecurity risks and payment-fraud prevention as part of standard operating procedures required under this Policy. At a minimum, those procedures shall include the following controls, which constitute binding policy requirements:

a. Written Transfer and Payment Authorization

All outgoing wire transfers of investment proceeds, settlements, or operating funds shall require dual authorization — meaning independent approval by two authorized Treasury personnel — prior to execution. No individual shall have the sole authority to both initiate and approve a wire transfer.

Wire transfers shall be executed only in accordance with standing settlement instructions on file with the City’s safekeeping agent or depository institution. Standing settlement instructions shall not be modified based solely on an email, fax, or other electronic communication. Any request to change settlement instructions must be verbally verified by telephone with a known contact at the receiving institution before implementation, using a telephone number



independently obtained from the City's records rather than any number provided in the modification request. The Treasury section shall retain all trade tickets, confirmation documents, settlement records, and investment account statements for seven years in accordance with the City's retention policies.

b. Verification of Broker-Dealer Instructions

Treasury staff shall not act on any instruction from a broker-dealer or counterparty to redirect funds to a new or modified account without completing a callback verification protocol. This protocol requires a return call to a pre-established contact number listed on the City's approved broker-dealer list, independent of any contact information provided in the instruction being verified.

c. System Access Controls

Access to the City's investment accounting system, banking portals, and safekeeping platforms shall be limited to authorized Treasury personnel. Access rights shall be reviewed no less than annually and shall be promptly revoked upon the departure or role change of any Treasury employee. Passwords and authentication credentials shall not be shared among staff. Multi-factor authentication shall be required for all remote access to treasury systems, where technically available.

d. Annual Review

The Treasurer shall ensure that the cybersecurity and payment-fraud controls described in this section are reviewed no less than annually and updated to reflect changes in the City's technology environment, banking relationships, or emerging fraud risks. Such reviews may be performed by the Internal Audit section, external auditors, or other qualified independent parties, consistent with the broader internal-controls review requirement outlined in the Executive Summary.

3. Managing Concentration of Credit Risk

The City believes that the most important means for ensuring safety of principal consists of purchasing investments of high credit quality, namely, those listed in Section III.A.1.a. At the same time, the City believes in the importance of a well-diversified Portfolio. It is the policy of the City to diversify its Portfolio so that reliance on any one issuer or broker-dealer will not place an undue financial burden on the City. Accordingly, the permitted concentrations of investments, as a percentage of the Portfolio and per individual issuer, are as indicated in Section III.A.1.a.. They are also presented in a table in Appendix D, which compares them with the limits imposed by the State.

4. Managing Interest Rate Risk

Interest rate risk is also referred to as "market risk." It is the risk that, when selling an investment in the Portfolio, the price and the proceeds received will be less than the purchase price and amount invested. This results in the erosion of principal, or



the realization of a capital loss. The longer the maturity date of bonds, the greater the price volatility, and the greater is the risk of principal erosion or selling the bond at a loss. Therefore, it is the City's Policy to concentrate its Portfolio in shorter-term securities in order to limit principal risk caused by changes in interest rates. In no event will the City exceed the guidelines established by State law and invest in any security whose maturity date at the time of purchase is in excess of five years. In addition, the City manages interest rate risk by measuring the weighted average maturity of the Portfolio as a method of gauging the degree of interest rate risk to which the Portfolio is exposed. The weighted average maturity is a mathematical calculation wherein the average of the number of days or years to the maturity dates of all the investments in the Portfolio is weighted by the amounts of each investment. The greater the amount of the investment, the greater the role it plays in determining the average number of days to maturity. For the City of Fresno, the weighted average maturity of its Portfolio shall not exceed three years. By maintaining the weighted average maturity of the Portfolio below three years, the City successfully minimizes potential losses from interest rate increases. In addition to the weighted average maturity constraint, the Treasurer shall monitor the modified duration of the Portfolio and shall include modified duration in the monthly reporting. The Treasurer may establish a target modified duration range consistent with this policy's weighted average maturity constraint and the current interest rate environment.

5. Managing Foreign Currency Risk

The City only invests in U.S. dollar denominated obligations. This successfully eliminates all risk of principal erosion due to fluctuations in the values of foreign currencies.

B. Policies to Ensure Adequate Liquidity

1. Depository Balances

The Treasurer and Treasury staff shall review the status of the City's demand deposit account, the expected inflows of cash from various sources, and the expected uses of cash for the day on a daily basis. The amount of funds needed for daily operations is determined, as is the amount of funds available to meet expected requirements. As a general rule, staff believe that an average balance of \$15,000,000 in the City's bank account is a reasonable target depository balance to meet operating fund requirements on any given day. The Treasurer shall review the operating fund target balance annually as part of the Policy review process and shall adjust the target as necessary to reflect changes in the City's average daily expenditure obligations, payroll cycles, and seasonal cash flow patterns. Any adjustment to the target balance shall be reported to the City Council as part of the annual Policy adoption. The difference between expected sources and uses of cash determines whether additional operating funds are needed or whether surplus funds are available for investment. Based on this analysis, the Treasurer and Treasury staff seek to generate additional cash inflows by surveying the financial markets for suitable investments. In achieving the former, staff may determine that selling an investment is the most advantageous course to take, or selling shares in a money market fund, or LAIF. In achieving the latter, staff may consult with broker-dealers, review the financial markets via the news media or email communications, or conduct research via the



City's financial subscription service. At all times, staff shall endeavor to achieve a balance ensuring that operating funds remain sufficient to meet the City's obligations, while any surplus funds are invested to achieve a financial return consistent with this Policy.

2. Repurchase Agreement Maturities

Because no secondary market exists for repurchase agreements, the maximum maturity for repurchase agreements in the Portfolio is one year.

3. Security Marketability

Liquidity is very closely correlated with the marketability of investments in the Portfolio. Liquidity can be defined as the ability to sell an investment at or near the original purchase price paid for it, whenever desired. This can only occur if there is an active market for the type of security to be sold. Such a market only exists for high quality types of investments. Thus, in addition to the objectives of legality and safety, the City also ensures adequate liquidity by investing only in obligations permitted by GC 53601, GC 53601.8, and GC 16429.1 as described above in Section III.A.1.a. Authorized Investments.

4. Scheduling Maturities Or Maintaining A "Barbell"

The Policy of the City is to maintain a schedule of maturities such that cash flow through maturities occurs in a manner adequate to fund City operations. As an alternative strategy, the City may maintain a "barbell" structure such that maturities are equally weighted toward a very short-term horizon (to provide liquidity) and a longer-term horizon (to provide higher yields). The Treasurer will determine which strategy will be most effective given current market conditions.

5. Investments in LAIF

While the City maintains a high-quality Portfolio, which will normally ensure the maintenance of adequate liquidity, either through a scheduled or "barbell" approach, the City must also be prepared for market aberrations which might serve to dampen liquidity, if only temporarily. Therefore, it is the Policy of the City to maintain an amount invested with LAIF that will provide adequate liquidity, as determined by the Treasurer, in the event that maturities in the Portfolio are not sufficient to fund operations, and securities cannot be sold to generate additional cash.



C. Policies To Achieve Investment Return Objectives

The policies set forth in this Section enable the City to achieve the yield objectives established for the Portfolio. The Treasurer shall document the allocation methodology between the operating liquidity pool and the core reserve pool in the standard operating procedures. The allocation shall be reviewed at least quarterly and shall reflect current cash flow forecasts, operating obligations, and investment maturities. Material changes in pool allocations shall be noted in the monthly investment report.

1. Yield Objective and Benchmark Standards

The City's portfolio shall be structured to achieve a market rate of return commensurate with its safety, liquidity, and duration constraints across varying economic conditions. Return on investment is the third priority of this Policy, subordinate to the safety of principal and the maintenance of adequate liquidity.

- a. Portfolio Segmentation- For performance-measurement purposes, the Treasurer shall manage and evaluate the portfolio in two distinct segments:

(1.) Operating liquidity pool.

This pool consists of funds required to meet the City's anticipated expenditure obligations within the next twelve months, together with any additional liquidity reserves the Treasurer determines to be prudent. It shall be managed to preserve capital and ensure immediate availability; yield is a secondary consideration.

(2.) Core reserve pool.

This pool consists of surplus funds not required for near-term operations and available for investment in longer-duration instruments consistent with this Policy's authorized investment list and maturity constraints.

- b. Benchmark Selection- The Treasurer or designee shall formally designate, and document in writing, the specific benchmarks used to evaluate each pool at least annually, prior to the start of each fiscal year. Benchmark selections shall be reported to the City Council as part of the annual investment-policy adoption. The following benchmarks are established as defaults; the Treasurer may substitute alternative benchmarks with documented rationale:

(1.) Operating liquidity pool:

The California Local Agency Investment Fund (LAIF) average rate of return, or the 90-day U.S. Treasury Bill constant-maturity rate, as the Treasurer deems most reflective of the pool's duration and liquidity profile.

(2.) Core reserve pool:



The 1–3 Year U.S. Treasury Index, the 1–3 Year U.S. Treasury/Agency blended index, or another index approved by the Treasurer that reasonably reflects the pool’s weighted-average duration and sector allocation.

- c. Performance Evaluation- The Treasurer shall compare the portfolio’s actual yield and total return against the designated benchmarks in the monthly investment report provided to the City Council. The report shall present performance for the current month and the trailing twelve months. Material and persistent underperformance relative to benchmarks shall be accompanied by a written explanation in the monthly investment report addressing market conditions, portfolio positioning, and any corrective actions considered or taken.

The Treasurer shall establish procedures for monitoring post-purchase credit events and rating changes affecting portfolio investments. The monthly or quarterly investment report shall identify any investment experiencing a material credit downgrade, negative credit watch placement, default event, or material deterioration in credit quality since purchase.

Investments that fall below Policy minimum credit requirements after purchase shall not require automatic liquidation if the Treasurer determines that continued holding is in the best financial interest of the City and consistent with the objectives of safety, liquidity, and preservation of capital.

- d. The appropriateness of designated benchmarks shall be evaluated at least annually as part of the policy-review process. If the portfolio’s actual duration, liquidity profile, or sector composition changes materially during the fiscal year, the Treasurer shall assess whether the current benchmarks remain appropriate and document that assessment.

Under normal market conditions, the City’s portfolio shall seek to achieve a net yield at or above the LAIF return for the operating-liquidity pool and at or above the designated core-reserve benchmark on an annualized basis. Failure to meet a benchmark in any single period does not, by itself, constitute a policy violation; benchmarks serve as performance guides, not minimum-return guarantees.

2. Portfolio Management Style

Management styles for fixed income portfolios range from a passive “buy and hold” approach to an extremely active “day trader” approach. It is the Policy of the City to manage the Portfolio in a prudent semi active portfolio management style, in order to enhance the overall yield on the Portfolio. Semi active management shall be conducted prudently and not for speculative purposes. In employing a semi active portfolio management style, investments will not be purchased with the sole objective of holding them until maturity. Investments can and will be sold prior to maturity if advantageous to the City. At the same time, however, buying solely in order to arbitrage and resell the investment constitutes speculation, and this practice is expressly prohibited.



3. Portfolio Maturity Management

As stated in Sections III.A.4. and III.B.3., when structuring the maturity composition of the Portfolio it is the Policy of the City to minimize interest rate risk and ensure adequate liquidity. Likewise, it is City Policy to evaluate current and expected interest rate yields and to invest accordingly, recognizing that the longer the time remaining to maturity for a security, the greater the price fluctuation which could occur, given changes in economic conditions and interest rate levels.

4. Bond Swaps

The City takes advantage of security swap opportunities to improve Portfolio yield. A swap that improves Portfolio yield may be selected even if the transaction results initially in a loss. (See Section V.E.)

5. Competitive Bidding, Negotiation

It is recognized that competitive bidding and negotiation for lower prices are two techniques that can enhance overall Portfolio yields. It is the Policy of the City to utilize one or both techniques, depending on the circumstances surrounding the transaction, when obtaining offers for the purchase of securities, or bids for the sale of securities.

6. Securities Lending

a. Overview

A securities loan is a transaction in which the owner of a security (the City) agrees to lend a security to a borrower (broker/bank) under terms negotiated at the time of the loan. During the period that a security is out on loan, the lender continues to have all the benefits of ownership. All interest or dividend income belongs to the lender. During the term of the loan, the borrower (broker/bank) pays a fee or interest to the lender (the City). During the term of the loan, the borrower must post collateral in the form of either cash or direct U.S. government and agency securities. The required collateral will always be in excess of the borrowed amount and be monitored by both parties. The term of the loan can be as short as overnight but usually averages 5 to 10 days.

b. Policy

The City may participate in securities lending transactions when determined by the Treasurer to be prudent, beneficial to the portfolio, and consistent with applicable law and approved written agreements. Securities lending will only be conducted under a written agreement approved by the City Attorney. The written agreement will detail:

- (1.) Acceptable types of collateral
- (2.) Standards of collateral custody and control



- (3.) Collateral valuation and initial margin
- (4.) Accrued interest, mark-to-market, and margin calls
- (5.) Method for transmitting security income
- (6.) Acceptable methods for delivery of securities and collateral
- (7.) Conditions that will terminate the loan

D. Policies To Encourage Local Development

1. Program Description

In accordance with current Council policies on the facilitation of local economic development, and the legal direction cited in Section I.A.5. of this Policy, local financial institutions will be utilized to provide investment products for a portion of the City's Portfolio. Such products will not necessarily result in maximum earnings for the Portfolio. However, the loss of short-term investment yields may be offset by the potential expansion of the tax base. Local financial institutions eligible for participation in this program are defined as: any financial institution whose deposits are insured by the Federal Deposit Insurance Corporation (for commercial and savings banks) and the National Credit Union Share Insurance Fund (for credit unions) and organized and chartered under the laws of the United States or the State of California (collectively, the Institution), which also satisfies each of the following: (i) the Institution was founded and is headquartered in Fresno, Madera, Merced, Kings or Tulare County; (ii) the Institution shall be able to collateralize City funds in accordance with California GC Section 53652; and/or the Institution shall be able to use a private sector entity that assists in the placement of certificates of deposit in accordance with California GC Section 53601.8; (iii) if the Institution is a commercial bank, it shall have and maintain a Community Reinvestment Act (CRA) assessment area that includes all or substantially all of the low and moderate income census tracts in Fresno County and its most recent publicly available CRA rating in California is Satisfactory or Outstanding; and (iv) if the Institution is a credit union, a savings and loan association, or a savings bank, it shall have met the minimum operating standards required by its appropriate Federal or State regulatory body. Local broker-dealers may be used if they can supply the requisite investment instruments needed for the Portfolio.

2. Program Objectives

The objectives of the Program are to partner with local financial institutions with invested funds to be used for the economic development, housing investment and other community services for Fresno, and to achieve a local preference for Fresno broker-dealers who can provide the necessary financial products to the City.

3. Apportionment



The Program will earmark up to fifteen million dollars (\$15,000,000) of the Portfolio for placement with local financial institutions.

4. Program Conditions For Local Financial Institutions

a. Financial Institution Questionnaire

All local financial institutions interested in the Program must complete a Depository Questionnaire (See Appendix A) and submit current and prior year audited financial statements, as well as the most recent quarterly statement of financial conditions. In the case of a bank, the bank's latest CRA Report shall be submitted. For all other local financial institutions, their latest publicly available regulatory report shall be submitted. (See also Section V.C.1.)

b. Collateral Requirements

A local financial institution participating in the Program must be willing and able to collateralize City deposits in accordance with California GC Section 53652. Alternatively, the local financial institution must be able to use a private sector entity that assists in the placement of certificates of deposit, in accordance with GC Section 53601.8.

c. Economic Development

Time deposits, as evidenced by a certificate, or a statement of the City's deposit, may be placed with those local financial institutions who qualify by certifying in the Depository Questionnaire that they have made loan(s) amounting to at least \$250,000 in any of the City of Fresno's low-income census tracts. If applicable, qualified institutions offering the highest interest rates will be given preference.

d. Other Conditions

- (1.) An executed Contract For Deposit of Moneys per GC Section 53649
- (2.) Collateralization required in accordance with GC Section 53652 or FDIC insurance in accordance with GC Section 53601.8 (c.)
- (3.) Waiver of collateral permissible per GC Section 53653
- (4.) A certificate or statement evidencing the deposit and its terms is required
- (5.) No pending bank material adverse financial events
- (6.) No conflicts of interest with City officials
- (7.) Satisfactory Community Reinvestment Act rating

5. Program Conditions For Broker-Dealers

a. Selection of Participant(s)



Local broker-dealers will be surveyed and selected in accordance with Section V.C.2. of this Policy.

b. Maintenance of “Good Standing”

The successful broker-dealer(s) and their firm must remain in good standing with the Securities and Exchange Commission (the “SEC”), the Financial Industry Regulatory Authority (the “FINRA”), and the State of California, in accordance with Section 25004 of the Corporations Code.

c. Selection of Investment Instruments

Investment instruments will be selected in accordance with Section III.A.1.a. of this Policy.

IV. INVESTMENT FUNCTION ORGANIZATIONAL STRUCTURE

A. Department of Finance

The Director of the City of Fresno’s Department of Finance serves as the City’s Controller and Treasurer. He/she is responsible for providing the necessary organization and resources to maintain the City’s financial standing. Divisions reporting to the Director are:

1. Financial Services Division

a. Accounting Section

This Section is responsible for central financial management functions, such as processing accounts payable, fixed asset management, enterprise and general accounting, grants management, and preparation of the City’s ACFR and State Controller’s Report.

b. Payroll Section

This Section is responsible for processing the City’s bi-weekly payroll and ensuring adherence to and proper application of all bargaining unit agreements.



c. Treasury Section

This Section is responsible for management of the City's Portfolio, daily cash management, debt administration, and bank reconciliations.

d. Collections Section

This Section is responsible for collection of various City of Fresno delinquent claims against others.

e. Business Tax & Permits Section

This Section is responsible for collecting taxes on business enterprises in the City of Fresno and issuing licenses and permits for certain regulated activities and events.

B. Treasury Section Responsibilities and Staffing – Investment Program Per GC 41006

1. Treasurer

The Director of Finance/City Controller also serves as the City's Treasurer. The Treasurer establishes overall policy, direction, and strategy for the City's investment program. He/she also sets overall policy, direction and strategy with regard to cash receipts processing and coordination of bank relations. The Treasurer may approve investments made by the Principal Accountant. The Treasurer establishes internal controls to the maximum extent permitted by budgetary constraints for the safeguarding and protection of all City assets. A primary method of ensuring effective internal controls is the segregation of duties, as detailed in Section IV of this Policy.

2. Assistant Controller (a deputy per GC 41006)

The Assistant Controller may approve investments made by the Principal Accountant or Division Manager. When the Principal Accountant position is vacant or temporarily unfilled, the Assistant Controller or Division Manager will assume responsibility for the Principal Accountant's day-to-day portfolio management activities.

3. Division Manager (a deputy per GC 41006)

The Division Manager may approve investments made by the Principal Accountant if both the Treasurer and Assistant Controller positions are vacant. When the Principal Accountant position is vacant or temporarily unfilled, the Assistant Controller or Division Manager will assume responsibility for the Principal Accountant's day-to-day portfolio management activities. The Division Manager may assist the Principal Accountant in making recommendations for policy changes, strategies and procedures for accomplishing Treasury goals and objectives.



4. Principal Accountant (a deputy per GC 41006)

The Principal Accountant in charge of investments (the "Principal Accountant") is responsible for executing the policies/strategies developed by the Treasurer and monitors the daily operations of the Treasury Section. The Principal Accountant monitors daily market activity, confers with broker-dealers and banks, and selects investments for the City's Portfolio. The Principal Accountant makes recommendations for policy changes, strategies and procedures for accomplishing Treasury goals and objectives.

5. Accountant-Auditor II (a deputy per GC 41006)

Two Accountant-Auditor IIs in the Treasury Section, under the supervision of the Principal Accountant, are responsible for daily cash management. They are also responsible for accounting for investment transactions and preparing the monthly investment reports.

C. Compensation Agreement

The Treasurer will charge all City Departments with funds in the Portfolio for administrative and overhead costs to manage the Portfolio. The Treasurer shall annually prepare a proposed budget, providing a detailed itemization of all estimated costs that comprise the administrative fee charged. Costs include, but are not limited to, Portfolio management, bank and custodial fees, software maintenance fees, and other indirect costs incurred in connection with handling or managing funds. The administrative fee may be subject to change and may be increased or decreased throughout the year in order to cover the costs of managing the Portfolio.

D. Treasury Continuity of Operations

In the event the Treasurer is unavailable to perform investment and cash management functions due to illness, leave of absence, or vacancy, investment authority shall vest in the Assistant Controller. If both positions are simultaneously unavailable, authority shall vest in the Division Manager. Any investment transactions carried out pursuant to this succession authority shall be documented and reported to the Finance Director within one business day. Treasury Section staff shall maintain documented standard operating procedures sufficient to enable continuity of critical investment and cash management functions in the absence of senior Treasury personnel.

E. Investment Advisor Guidance

The City currently manages its investment program with internal Treasury staff and does not employ an external investment advisor. Should the City in the future engage an external investment advisor or outsourced chief investment officer (OCIO), such engagement shall comply with the following requirements: (a) the advisor shall be registered with the Securities and Exchange Commission under the Investment Advisers Act of 1940; (b) the engagement shall be documented in a written agreement approved by the City Attorney specifying scope of authority, prohibited transactions, fee structure, reporting obligations, and performance standards; (c) and the Treasurer shall retain ultimate authority over all investment decisions and the advisor shall not have discretionary authority to execute transactions without Treasurer approval.. Additionally,



the selection of an external investment advisor shall comply with the City's procurement policies and a formal RFP process should be initiated.

V. INVESTMENT OPERATING PROCEDURES

A. Investment Program Development

1. Overview

The investments of the City of Fresno are administered according to an investment program. The program is formulated by the Treasurer with the overall review and approval of the City Manager. The Treasurer shall evaluate the program at least monthly and recommend any changes that he/she feels to be warranted.

2. Program Organization

The Principal Accountant shall review the investment program daily to analyze performance and monitor any variances from the Policy. Results will be reported monthly to the Treasurer, and, in turn, the City Manager, Mayor and the City Council.

3. Program Operations

The investment program is developed by the Treasurer, Assistant Controller, Principal Accountant, and Accountant-Auditor II through the following procedures:

- a. Observe and summarize economic and market analysis
- b. Forecast available cash for investment. See III. B. 1.
- c. Formulate strategies concerning
 - (1.) Asset mix
 - (2.) Investment instruments
 - (3.) Maturities
 - (4.) Target yields
- d. Monitor performance against the current investment program
- e. Evaluate any reasons for variance

B. Market and Economic Analysis

1. Overview

The Principal Accountant will be responsible for routinely performing market and economic analysis to support investment strategy development and program planning. This analysis will be performed using information obtained from



investment advisors and brokers, as well as original data. The objective of the market and economic analysis will be to forecast probable market conditions for the period for which investments are planned.

2. Data Analysis

Economic and market analysis is performed routinely by assembling and analyzing current and trend data. Market analysis utilizes, for example, the following types of data:

- a. Basis point changes
- b. Tracking of individual securities
- c. Shape of the yield curve
- d. Yield curve movements

C. Selection Criteria For Local Financial Institutions and Broker-Dealers

1. Selection Criteria for Local Financial Institutions

a. Minimum Criteria For Selection

The Treasurer may approve a local financial institution if all the following criteria are met:

- (1.) The financial institution must provide insurance to its depositors through the FDIC or the National Credit Union Share Insurance Fund (NCUSIF).
- (2.) Only local financial institutions organized and chartered under the laws of the State of California, or the laws of the United States shall be appointed as depositories of City funds.
- (3.) The institution must be willing and able to collateralize City funds in accordance with California GC Section 53652.
- (4.) Alternatively, an institution must be able to use a private sector entity that assists in the placement of certificates of deposit that will be insured in accordance with GC Section 53601.8 (c).
- (5.) The institution must complete a City of Fresno Deposit Questionnaire. (See Appendix A)

2. Selection Criteria For Broker-Dealers

The Treasurer shall maintain an approved list of securities broker-dealers with whom the City may conduct security transactions. Only those broker-dealers on the approved list are entitled to submit quotations and transact business with the City.



Any broker-dealer failing to maintain the minimum criteria outlined below will be deleted from the approved list.

a. Regulated Broker-Dealers

Only approved broker-dealers will be used for investment transactions. Approved broker-dealers shall be registered with the SEC as applicable, be members in a good standing FINRA and, when relevant, the MSRB framework, be licensed or otherwise legally authorized to transact in California, provide current audited financial statements and regulatory disclosures, disclose material litigation or enforcement actions, acknowledge receipt of the City's Investment Policy annually, and be subject to annual review and removal by the Treasurer.

Each approved broker/dealer shall maintain minimum excess net capital of not less than \$10,000,000 as reported in its most recent FOCUS Report filed with FINRA. Prior to placement on the approved list, the Treasurer or designee shall conduct a FINRA BrokerCheck search for each firm and its account representatives assigned to the City and shall document the results.

The Treasurer shall not approve any broker-dealer or securities firm that has, within the preceding two years, made a political contribution to the Treasurer or any elected official in an amount exceeding the limits established by MSRB Rule G-37. Each approved broker-dealer shall annually certify compliance with this provision.

b. Broker-Dealer Certification

Each broker-dealer must complete the Broker-Dealer Certification (Appendix B) before conducting investment business with the City.

c. Broker-Dealer Diversification

There is no minimum or maximum number of broker-dealers that may be used by the City. The Treasurer may limit the number of broker-dealers with whom the City may do business.

d. Broker-Dealer Disclosure

Each broker-dealer on the City's approved list shall provide prompt written notification to the Treasurer — within one business day — of any material adverse change in its financial condition, regulatory standing, or organizational structure. Material adverse changes include, without limitation: (a) excess net capital falling below the minimum threshold specified in this Policy; (b) the imposition of regulatory sanctions, cease-and-desist orders, or formal enforcement actions by the SEC, FINRA, MSRB, or any state regulator; (c) material pending or settled litigation involving public fund clients; (d) a change in ownership, control, or key personnel assigned to the City's account; or (e) the loss of required licensure. Failure to provide timely notification shall result in immediate suspension from the approved list pending review by the Treasurer.



e. Removal From Approved List

If, in the judgment of the Treasurer, a broker-dealer is considered to be placing the City's investments at risk, removal from the approved list can be done immediately.

D. Instrument Selection

1. Liquidity Needs

Investments are ordinarily selected according to anticipated cash needs. The City's normal operating cycle results in a larger need for liquidity during the months of November, December, and June. Investments shall be made with these requirements in mind.

A liquidity stress test shall be conducted at least quarterly, modeling at minimum the following scenarios: (a) a 30-day period of no new investment maturities and no LAIF availability; (b) a scenario in which the City must fund a capital emergency equal to 10% of the portfolio within five business days; and (c) a scenario in which two of the City's largest investment counterparties simultaneously experience a credit event.

2. Portfolio Structure and Policy Guidelines

The Principal Accountant shall evaluate the composition of the current Portfolio to ensure that any securities being considered will maintain compliance with Policy guidelines.

3. Current and Expected Yield Curve Analysis

The Principal Accountant will monitor the current and expected yield curves. When interest rates are expected to decline, consideration will be given to extending weighted average maturity of the Portfolio within Policy constraints. When interest rates are expected to increase, consideration will be given to shortening the weighted average maturity of the Portfolio.

4. Yield Spread Analysis

The Principal Accountant will monitor yield spreads among various Government Agency issues and U.S. Notes and Bonds.

E. Bond Swaps

1. Overview

One element of active investment management includes swapping a bond held in the City's Portfolio for a comparable bond in the marketplace. The purpose of such a transaction is to enhance the overall yield on the Portfolio.



2. Criteria For Swaps

A security swap may be considered if:

- a. The overall yield of the Portfolio after the swap does not decrease
- b. The maturity date of the new security is not more than two years longer than the maturity of the old security.

3. Criteria For Analyzing Swap Candidates

Documentation of the incremental gain from doing a swap, as shown through an analysis similar to that provided by Bloomberg's "Swap-Switch Book Analysis" will be maintained with the City's permanent accounting documents.

4. Identification of Swap Candidates

Swaps may also be suggested by broker-dealers who are on the City's approved list. Consistent with other parts of this Policy, all purchases and sales can be competitively bid. If a particular swap is recommended by a broker-dealer, and that broker-dealer has the best bid as determined by the Principal Accountant, the broker-dealer who made the recommendation will be awarded the swap.

5. Categories of Swaps

The basic types of swaps are as follows:

a. Swaps to Increase Yield

Aberrations in the market are often caused by supply and demand conditions for particular securities. If a short supply exists in a particular maturity range, for example, it may often be advantageous to swap out the security in short supply for another similar security in a different maturity range.

b. Swaps to Increase Portfolio Quality

Occasionally the demand for a particular security can create a situation where the security yields the same or less than an equivalent security with a higher rating. An improvement in Portfolio quality can thus be obtained by swapping the former security for the latter issue.

F. Certification

A copy of this Policy shall be provided to the senior management of any financial institution, dealer, or broker-dealer wishing to transact investment business with the City, so that they are informed of the City's investment objectives. Prior to transacting any business, a senior representative of the firm must sign a certification acknowledging receipt and understanding of the Policy.



VI. PERFORMANCE EVALUATION AND REPORTING

Investment performance is continually monitored and evaluated by the Treasurer and Treasury staff. Investment performance statistics and activity reports are generated by the City's automated investment accounting system. The Treasury Section will produce summary reports on a monthly basis for review by the Mayor, City Manager, City Council and Internal Auditor.

A. Standard Monthly Investment Reports

The following reports will be produced monthly and be included among the Treasurer's monthly activity reports.

1. Month-end Report

The month-end balance of operating funds, in the form of the bank balance, which has been reconciled with the balance in the City's financial accounting system, will be reported. The bank reconciliation shall be available upon request.

The month-end Portfolio holdings will be shown by category of investment, showing the total book value, the total par value, the total market value, and the total expected returns of each category of investment. The rate of return on the Portfolio will be presented, both month-to-date and for the previous rolling twelve months. Additionally, the total interest earned on the Portfolio is shown, both month-to-date and year-to-date. (More detailed reports concerning the investments themselves shall be available upon request.)

Additionally, reports shall include benchmark comparisons, weighted average maturity and modified duration of the portfolio (where available from the City's investment accounting system), portfolio compliance status, and a statement regarding the City's ability to meet expenditure requirements for the next six months.

2. Maturity Distribution Report

The month-end Portfolio holdings will be shown in a table by category of investment and grouped by the remaining maturity. A bar chart will also show the distribution of the par value by maturity.

3. Portfolio Position Detail

The complete list of month-end Portfolio holdings will be shown by category of investment. The listing will display each holding's issuing institution, CUSIP number, coupon rate, yield to maturity, purchase date, maturity date, par value, amortized value, market value, and ending unit price. For each holding in the Portfolio, the monthly report shall include, where available from the City's investment accounting system, the GASB 72 fair value hierarchy classification (Level 1, Level 2, or Level 3) and the source of the market valuation, consistent with the requirements of GASB Statement No. 72 and the City's ACFR investment note disclosure practices.



4. Custom Reports Are Available On Request

B. Quarterly Reports

GC Section 53646(b) encourages that a quarterly investment report be prepared by the treasurer or chief financial officer and submitted to the City Council within 45 days following the end of the quarter covered by the report. These reports, shall include, at minimum: holdings by type, issuer, maturity, book value, par value, and market value; benchmark comparison; weighted average maturity and modified duration of the portfolio; identification of any outside-managed accounts or programs; a statement of portfolio compliance or noncompliance with this Investment Policy; a statement regarding the City's ability to meet expenditure requirements for the next six months; and the source of market valuations where required by law. These reporting requirements will be reflected in the monthly investment report.

C. Changes To The Policy

The City Council is encouraged by GC Section 53646 and required by FMC Section 7-104 to consider and approve an Investment Policy at least annually. Following adoption of the Policy, the Council must approve material changes or revisions to the Policy as well.



APPENDIX A

**CITY OF FRESNO
FINANCE DIVISION/TREASURY SECTION
2600 FRESNO STREET, ROOM 2156
FRESNO, CALIFORNIA 93721**

DEPOSITORY QUESTIONNAIRE AND CERTIFICATION

(Please type in response.)

1. Name of Depository

2. Address: _____ Corporate: _____

3. Primary Representative: _____ Alternate: _____

Name: _____ Name: _____

Title: _____ Title: _____

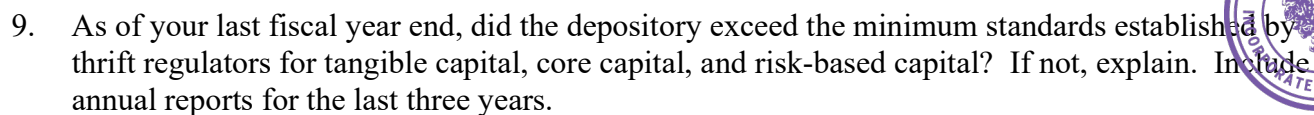
Phone: (800) _____ Phone: (800) _____

4. Check the investment instruments offered by your institution.

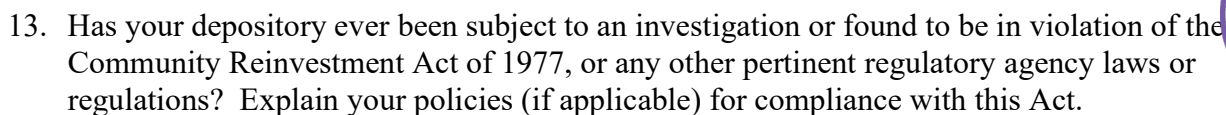
Instrument Types	
U.S. Treasuries	
Government Sponsored Corporations	
Bankers Acceptances	
Commercial Paper	
Certificates of Deposit	
Repurchase Agreements	
Reverse Repurchase Agreements	
Medium-term Corporate Notes/Bonds	
Mutual Fund Shares	
Asset-Backed Securities	



5. Explain your collateral practices and policies for public fund deposits. Does the depository consistently have collateral available in amounts exceeding \$1 million? In what form are public deposits collateralized?
6. Does the depositor have the option to select the type of collateral? If so, does the interest rate vary according to the collateral? Explain.
7. Does the bank utilize a private sector company that assists in the placement of certificates of deposit, with Insuring Institutions such as IntraFi, through its Certificate of Deposit Account Registry Service (“CDARS”)?
8. Explain your methodology for establishing interest rates on public fund deposits. Are rates driven off a standardized market index? Are rates set in correlation with specific loan demands upon the depository?



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Certification

(To be signed by a person authorized by corporate resolution or by similar proceedings to make representations on behalf of the responding institution.)

I hereby certify that I have personally read the Investment Policy and Objectives of the City of Fresno for Fiscal Year _____, ending June 30, _____, and have directed staff assigned to the City's account to do the same. The standards of this Policy will apply to all investments subsequent to its effective date as determined by the Fresno City Council. Furthermore, I agree to personally read any changes or amendments to this Investment Policy which may be submitted by the City. This institution has in place procedures and a system of controls to preclude imprudent investment activities arising out of transactions conducted between our institution and the City of Fresno. All assigned personnel to the City's account will be routinely informed of the City's investment objectives, horizon, strategies and risk constraints whenever I am so advised by City personnel. Either I, or an assigned representative, will notify City staff immediately by telephone and in writing in the event of a material adverse change in our financial condition. I pledge to exercise due diligence in informing City staff of all foreseeable risks associated with financial transactions conducted with this institution. I attest to the accuracy of the responses within this questionnaire.

Signed: _____ Name: _____

Title: _____ Date: _____

Attest: _____ Name: _____

Title: _____ Date: _____



APPENDIX B

City of Fresno Finance Department
2600 Fresno Street, Room 2156
Fresno, California 93721
(559) 621-7004, fax (559) 488-4636
www.fresno.gov

BROKER/DEALER REQUEST FOR INFORMATION

SECTION 1: STATEMENT OF POSITION AND GENERAL REQUIREMENTS

The City of Fresno (hereinafter referred to as the "Government") is a statutory (home rule) Government operating under the laws of the State of California. The Government manages an operational portfolio ranging in size from 250 million to 300 million dollars, which is comprised mainly of U.S. agency obligations, corporate notes, treasury notes, and selected money market instruments. The Government has adopted a written Investment Policy which regulates the standards and procedures used in its cash management activities. A copy of the Investment Policy is attached as an Appendix to this document.

The Government maintains relationships with qualified members of the broker/dealer community who, in their opinion, understand the needs, constraints, and goals of the Government.

Broker/dealers will be notified of their approval by the Government in writing. No transactions will be conducted with an approved broker/dealer until all paperwork required by both parties has been executed. The Government solicits competitive bids and offers on the majority of its transactions. All securities will be delivered against payment to the third-party custodian named by the Government. Government personnel will review and substantiate all information and references requested in the document; therefore, please answer all questions as thoroughly as possible.

SECTION II - PART I: REQUEST FOR GENERAL INFORMATION FROM BROKER/DEALER CANDIDATE

1. Name of Firm _____
2. Address-Local _____
Headquarters _____

(Provide both street address and/or P.O. Box No., if applicable)
3. Telephone No. Local () _____
(800) _____
Headquarters () _____



4. Contact personnel: (provide as an attachment if more space is required)

Name _____

Title _____

Telephone No. _____

Name _____

Title _____

Telephone No. _____

Name _____

Title _____

Telephone No. _____

4a. Provide background information concerning the account representative listed in No. 4 above. Please include information on the individual's employment history as it relates to the securities industry, official licenses and certificates, the history and details of any disciplinary actions or complaints and the disposition of each as well as the history of any arbitration or litigation, the nature of the case and status or disposition.

5. Please provide the following information regarding at least four comparable clients with whom any of the representatives listed in No. 4 has an established relationship. We would prefer public sector clients in our geographical area, if possible.

Client Name _____

Address _____

Person to contact _____

Telephone No. _____

Length of relationship _____



Client Name _____

Address _____

Person to contact _____

Telephone No. _____

Length of relationship _____

Client Name _____

Address _____

Person to contact _____

Telephone No. _____

Length of relationship _____

Client Name _____

Address _____

Person to contact _____

Telephone No. _____

Length of relationship _____

6. Has/have the representative(s) listed in No. 4 above been authorized by the firm to be account representative(s) for City of Fresno, California?

Yes _____ No _____

If yes, by whom? _____

7. Please list the name of the immediate supervisor of the account representative(s) named

in your response to No. 4 above.







8. Briefly describe any formal program of supervision of the account representative named in No. 4, if your firm has established such a program.

9. Is the firm either licensed or supervised by the Securities Exchange Commission and the Financial Industry Regulatory Authority? If not, why not?

10. Place an "X" by each regulatory agency that your firm is examined by and/or is subject to its rules and regulations.

FDIC _____ SEC _____ NYSE _____

Comptroller of Currency _____ Federal Reserve System _____

Other (example: State Regulatory Agency). Multi-state firms please note: It is not necessary to include regulatory agencies which do not have jurisdiction over your firm's activities in Fresno, California.

11. Have you obtained all required licenses to operate as a broker/dealer in the state of California?

Yes _____ No _____

12. If you are not a Bank, please provide the following information regarding your principal banking relationship.

Bank Name _____

Address _____

Person to contact _____

Telephone No. _____

Length of relationship _____



13. Is the firm a primary dealer in U.S. Government Securities?

Yes _____ If so, how many years? _____ No _____



14. Indicate the investment instruments offered regularly by the firm by placing a check mark next to the type of instrument. Is the firm a primary dealer in U.S. Government Securities?

Instrument Types	Check if Applicable
U.S. Treasuries	
Government Sponsored Corporations	
Bankers Acceptances	
Commercial Paper	
Certificates of Deposit	
Repurchase Agreements	
Reverse Repurchase Agreements	
Medium-term Corporate Notes/Bonds	
Mutual Fund Shares	
Asset-Backed Securities	

15. Does your firm specialize in any of the instruments listed above? If so, please specify which ones.

16. Has the firm ever been notified in writing by a public-sector client that the firm or a firm representative was in part responsible for a loss on a securities transaction? If so, explain.

17. Has the firm ever been subject to a regulatory or state or federal agency investigation for alleged improper, fraudulent or disreputable activities in connection with a public-sector client? If so, explain.



Section II-Part II: Request for Broker/Dealer Candidate Disclosure

18. To the best of your knowledge, has there been any "material" litigation, arbitration or regulatory proceedings, either pending, adjudicated or settled, that your firm has been subject to within the last five years that involved issues concerning the suitability of the sale or purchase of securities to institutional clients or fraudulent or unfair practices related to the sale of securities to an institutional client? If so, please describe each such matter briefly. For purposes of this section, proceedings are "material" if your independent accountant applying generally accepted accounting principles determines that such proceedings required disclosure on your financial statements.

19. Explain the firm's practices for monitoring credit quality of institutions. Does the firm have internal expertise in this area?

20. What was the firm's capital position as of last fiscal year end?

21. Are there any fees or charges for doing business with your institution? If so, include a complete schedule of fees and charges.

22. Please provide certified audited financial statements for the last three years. In addition, for those dealers preparing and submitting financial statements to the following organizations, please provide publicly available financial documents filed with these agencies for the previous two years:

Financial Industry Regulatory Authority (FINRA)
Securities and Exchange Commission
New York Stock Exchange
Federal Deposit Insurance Corp.



CERTIFICATION

(To be signed by a person authorized by corporate resolution or by similar proceedings to make representations on behalf of the responding institution.)

I hereby certify that I have personally read the Investment Policy and Objectives of the City of Fresno for Fiscal Year _____, ending June 30, _____, and have directed staff assigned to the City's account to do the same. The standards in this Policy will apply to all investments subsequent to its effective date, as determined by the Fresno City Council. Furthermore, I agree to personally read any changes or amendments to this Investment Policy, which may be submitted by the City. This firm has in place procedures and a system of controls to preclude imprudent investment activities arising out of transactions conducted between our institution and the City of Fresno. All assigned personnel to the City's account will be routinely informed of the City's investment objectives, horizons, strategies and risk constraints whenever I am so advised by City personnel. Either I or an assigned representative will notify City staff immediately by telephone and in writing in the event of a material adverse change in our financial condition. I pledge to exercise due diligence in informing City staff of all foreseeable risks associated with financial transactions conducted with this institution. I attest to the accuracy of the responses within this questionnaire.

Signed: _____

Name: _____

Title: _____

Date: _____

Attest: _____

Name: _____

Title: _____

Date: _____



APPENDIX C

Glossary of Cash Management Terms

The following is a glossary of key investment terms, many of which appear in the City of Fresno Investment Policy.

Accrued Interest - The accumulated interest due on a bond as of the last interest payment made by the issuer.

Agency Note (or Federal Agency or United States Government-Sponsored Enterprise) - A debt security issued by a federal or federally sponsored agency. Federal agencies are backed by the full faith and credit of the U.S. Government. Federally sponsored agencies (FSAs) are backed by each particular agency with a market perception that there is an implicit government guarantee. An example of federal agency is the Government National Mortgage Association (GNMA). An example of an FSA is the Federal National Mortgage Association (FNMA).

All Available Funds – All monies deposited in the City of Fresno Treasury at any one time, which may be used for operations or are available for investment. The total amount of surplus funds and operating funds which the City of Fresno may legally claim at any one time.

Amortization - The systematic reduction of the amount owed on a debt issue through periodic payments of principal.

Average Life - The average length of time that an issue of serial bonds and/or term bonds with a mandatory sinking fund feature is expected to be outstanding.

Banker's Acceptance - Bill of exchange or time draft drawn on and accepted by a commercial bank. With the credit strength of the bank behind it, the banker's acceptance usually qualifies as a money market instrument.

Barbell – Portfolio management strategy in which funds are concentrated in both short term and long-term type of investments, with little to nothing in mid-term securities. Designed to provide liquidity while at the same time capturing higher yields from longer-term investments.

Basis Point - A unit of measurement used in the valuation of fixed-income securities equal to 1/100 of 1 percent of yield, e.g., "1/4" of 1 percent is equal to 25 basis points.

Bid - The indicated price at which a buyer is willing to purchase a security or commodity.

Book Value - The value at which a security is carried on the inventory lists or other financial records of an investor. The book value may differ significantly from the security's current value in the market.

Broker-Dealer – An investment securities sales firm that has the ability to both arrange for sales of securities, as well as buying securities for its inventory.

Callable Bond - A bond issue in which all or part of its outstanding principal amount may be redeemed before maturity by the issuer under specified conditions.



Call Price - The price at which an issuer may redeem a bond prior to maturity. The price is usually at a slight premium to the bond's original issue price to compensate the holder for loss of income and ownership.

Call Risk - The risk to a bondholder that a bond may be redeemed prior to maturity.

Capital – Funds which may be invested in various projects, ventures, or enterprises.

Cash Sale/Purchase - A transaction which calls for delivery and payment of securities on the same day that the transaction is initiated.

CDARS – Certificate of Deposit Account Registry Service is the copyrighted deposit placement service offered through IntraFi. Through this service, IntraFi attempts to place time deposits (CDs) issued by Insured Institutions within the IntraFi network in principal amounts that will not exceed the Standard Maximum Insurance Amount (SMDIA) for deposits of one depositor at one Insured Institution (currently \$250,000). CDARS is a proprietary process owned by IntraFi that allocates orders submitted by participating financial institutions on behalf of their depositors on dates (Order Dates) specified by Promontory.

CDARS Deposit Placement Agreement – Contract between depositor and participating depository financial institution for the placement of time deposits with other participating depository financial institutions by the contracted participating depository financial institution, through IntraFi, utilizing Promontory's Certificate of Deposit Account Registry Service (CDARS).

Certificates of Deposit (non-negotiable) – Receipts for funds deposited in a bank or savings and loan association for a specified period of time at a specified rate of interest. The first \$250,000 is guaranteed by the Federal Deposit Insurance Corporation (FDIC) for banks, the Federal Savings and Loan Insurance Corporation (FSLIC) for savings and loan associations and the National Credit Union Share Insurance Fund (NCUSIF) for credit unions.

Collateralization - Process by which a borrower pledges securities, property, or other deposits for the purpose of securing the repayment of a loan and/or security.

Collateralized Mortgage Obligation – Mortgage-backed bond separating mortgage pools into different maturity classes.

Commercial Paper - An unsecured short-term promissory note issued, with maturities ranging from 1 to 397 days, issued by banks, corporations, and other borrowers to investors with temporarily idle cash. Such instruments are unsecured and usually discounted.

Consumer Receivable-backed Bond - See Consumer Receivable Pass Through.

Consumer Receivable Pass Through – Debt instrument secured by consumer receivables such as credit card receivables. Payments are passed through to the investor directly from the underlying receivable.

Convexity - A measure of a bond's price sensitivity to changing interest rates. A high convexity indicates greater sensitivity of a bond's price to interest rate changes.



Coupon Rate - The annual rate of interest received by an investor from the issuer of certain types of fixed-income securities. Also known as the “interest rate.”

Counterparty – Other party to a transaction. Buyers and sellers are counterparties to each other, for example.

Credit Quality - The measurement of the financial strength of a bond issuer. This measurement helps an investor to understand an issuer’s ability to make timely interest payments and repay the loan principal upon maturity. Generally, the higher the credit quality of a bond issuer, the lower the interest rate paid by the issuer because the risk of default is lower. Credit quality ratings are provided by nationally recognized rating agencies.

Credit Risk - The risk to an investor that an issuer will default in the payment of interest and/or principal on a security.

Current Yield (Current Return) - A yield calculation determined by dividing the annual interest received on a security by the current market price of that security

Custodian – Bank or other financial institution having custody or possession of the assets of another business or individual for the purpose of safekeeping.

Debt Instrument – Any of a number of obligations to repay funds or monies borrowed, usually with interest. Examples include loans, mortgages, bonds, debentures, and certificates of deposit.

Default – Failure to repay a debt obligation.

Delivery Versus Payment (DVP) - A type of securities transaction in which the purchaser pays for the securities when they are delivered either to the purchaser or his/her custodian.

Discount - The amount by which the par value of a security exceeds the price paid for the security.

Diversification - A process of investing assets among a range of security types by sector, maturity, and quality rating.

Equipment Lease-backed Security – Debt instrument backed by equipment leases. Repayment comes from lease payments by the lessee on equipment leased.

Fair Value - The amount at which an investment could be exchanged in a current transaction between willing parties, other than in a forced or liquidation sale.

FDIC – Federal Deposit Insurance Corporation. An agency of the United States Government that insures bank deposits against loss of principal in the accounts of the bank’s depositors, up to a maximum amount of funds deposited per account (currently \$250,000).

Federal Funds - Fed Funds - Funds placed in Federal Reserve banks by depository institutions in excess of current reserve requirements. These depository institutions may lend fed funds to each other overnight or on a longer basis. They may also transfer funds among each other on a same-day basis through the Federal Reserve banking system. Fed funds are considered to be immediately



available funds.

Federal Funds Rate - Interest rate charged by one institution lending federal funds to the other.

GASB – Governmental Accounting Standards Board

GASB 3 – GASB Pronouncement providing direction and guidance on how a government’s cash and investments are to be presented in the government’s Comprehensive Annual Financial Report.

GASB 31 – GASB Pronouncement providing further direction and guidance on how a government’s cash and investments are to be presented in the government’s Comprehensive Annual Financial Report. It requires that the fair value of the government’s investments be presented.

GASB 40 – Revises GASB 3 to require additional disclosure of the degree of risk associated with a government’s investment portfolio.

GASB 72 - GASB Pronouncement with respect to a government’s cash and investments. It provides guidance for determining a fair value measurement for financial reporting purposes.

GASB 79- GASB Pronouncement that allows qualifying external investment pools and their municipal participants to report investments at amortized cost rather than fair value when specific criteria are met.

Government Securities - An obligation of the U.S. government, backed by the full faith and credit of the government. These securities are regarded as the highest quality of investment securities available in the U.S. securities market. See “Treasury Bills, Notes, and Bonds.”

Government Sponsored Enterprise – See Agency Notes.

Indenture – Agreement between bondholders, trustee and issuer, in which issuer agrees to repay monies borrowed from bondholders. Specifies how proceeds of bond issue may be used.

Insured Institution – Term used to describe a financial institution that is one of the participants in the IntraFi. These are banks who agree to accept a time deposit and issue a Certificate of Deposit (“CD”) to a depositor in an account that is insured by the Federal Deposit Insurance Corporation (“FDIC”). The principal, along with aggregated interest in this account, shall not exceed the Standard Maximum Deposit Insurance Amount (“SMDIA”) offered by the FDIC (currently \$250,000 per account.)

Interest Rate - See “Coupon Rate.”

Interest Rate Risk - The risk associated with declines or rises in interest rates which cause in investment in a fixed-income security to increase or decrease in value.

Inverted Yield Curve - A chart formation that illustrates long-term securities having lower yields than short-term securities. This configuration usually occurs during periods of high inflation coupled with low levels of confidence in the economy and a restrictive monetary policy.

Investment Company Act of 1940 - Federal legislation which sets the standards by which



investment companies, such as mutual funds, are regulated in the areas of advertising, promotion, performance reporting requirements, and securities valuations.

Investment Policy - A concise and clear statement of the objectives and parameters formulated by an investor or investment manager for a portfolio of investment securities.

Investment-grade Obligations - An investment instrument suitable for purchase by institutional investors under the prudent person rule. Investment-grade is restricted to those obligations rated BBB or higher by a rating agency.

Inverse Floaters – Debt securities paying an interest rate that floats inversely with a specified index, such as the T-Bill rate. For example, as the T-Bill rate rises, the Inverse Floater rate will decline.

Issuer – An issuer of debt, for example, bonds, is a borrower of funds in the debt markets.

Liquidity - An asset that can be converted easily and quickly into cash.

Liquidity Stress Test - A structured analytical exercise conducted by the Treasurer or designee to evaluate whether the City's investment portfolio can meet anticipated and unanticipated cash obligations under adverse conditions without requiring the forced sale of securities at a loss.

Local Agency Investment Fund (LAIF) – Fund managed by the California Treasurer's Office, offering local agencies the opportunity to invest surplus funds at better than average market rates of return with same-day liquidity.

Mark-to-market - The process whereby the book value or collateral value of a security is adjusted to reflect its current market value.

Market Risk - The risk that the value of a security will rise or decline as a result of changes in market conditions.

Market Value - Current market price of a security.

Maturity - The date on which payment of a financial obligation is due. The final stated maturity is the date on which the issuer must retire a bond and pay the face value to the bondholder. See "Weighted Average Maturity."

Medium-term Notes - All corporate and depository institution debt securities with a maximum of five years or less remaining to the date of maturity at the time of purchase, issued by corporations organized and operating within the United States or by depository institutions licensed by the United States or any state and operating within the United States.

Modified Duration - A measure of a bond's or portfolio's price sensitivity to changes in interest rates, expressed in years. Specifically, modified duration estimates the percentage change in the market value of a security or portfolio for a one percentage point (100 basis point) change in interest rates.

Money Market Mutual Fund - Mutual funds that invest solely in money market instruments (short-term debt instruments, such as Treasury bills, commercial paper, bankers' acceptances, repos and



federal funds).

Mortgage-derived Interest-only Strips - Derivative investment consisting of a series of interest payments from mortgages. Risky because original investment may or may not be paid back.

Mortgage Pass-through security – Security that pays investors everything received. All principal and interest received is passed through to the investor.

Mortgage-backed Bond – Bond securitized by mortgages. Issued by FNMA and FHLMC for example.

Mutual Fund - An investment company registered under the Investment Company Act of 1940 that pools investor funds for investment in diversified securities, including fixed-income securities and money market instruments. Mutual funds are regulated by the Securities and Exchange Commission (SEC) and are subject to applicable federal regulations governing disclosure, liquidity, valuation, governance, and investment operations:

1. Report standardized performance information.
2. Provide periodic disclosure regarding portfolio holdings, investment objectives, risks, expenses, and performance.
3. Operate under the oversight of a board of directors or trustees, including independent members.
4. Maintain liquidity standards consistent with applicable SEC regulations.
5. Value portfolio holdings regularly in accordance with SEC and accounting requirements.
6. Utilize registered investment advisers and licensed securities professionals where required by law.
7. Operate pursuant to a prospectus or offering document filed with the SEC and periodically updated.

Nationally Recognized Statistical Rating Organization (NRSRO) – Commonly known as a “rating agency,” an organization issuing credit ratings or scores with regard to the credit quality of the debt instruments issued by both public and private entities. Best known examples include Moody’s, Standard and Poor’s, and Fitch.

Negotiable Certificate of Deposit – Large dollar amount, short-term certificate of deposit issued by large banks and bought mainly by corporations and institutional investors. They are payable to the bearer or to the order of the depositor and, being negotiable, they are traded in an active market and usually have a maturity of less than six months.

Net Asset Value - The market value of one share of an investment company, such as a mutual fund. This figure is calculated by totaling a fund’s assets which includes securities, cash, and any accrued earnings, subtracting this from the fund’s liabilities and dividing this total by the number of shares outstanding. This is calculated once a day based on the closing price for each security in the fund’s portfolio. (See below.) $[(\text{Total assets}) - (\text{Liabilities})]/(\text{Number of shares outstanding})$

Nominal Yield - The stated rate of interest that a bond pays its current owner, based on par value of the security. It is also known as the “coupon,” “coupon rate,” or “interest rate.”

Offer - An indicated price at which market participants are willing to sell a security or commodity. Also referred to as the “Ask price.”



Operating Funds – Amount of money needed to meet the operating needs of the City on a daily, weekly, monthly or annual basis. This includes the amount of money needed to pay vendors, employees, bondholders, and other creditors. This is the amount of money normally kept in the City’s bank account to pay City obligations. As specified in the Policy, the target amount for this balance is \$15,000,000 on any given day. By contrast, see “Surplus Funds.”

Par - Face value or principal value of a bond, typically \$1,000 per bond.

Pay-through Bond – Bond whose cash flow generated by its underlying security is paid through to investors

Positive Yield Curve - A chart formation that illustrates short-term securities having lower yields than long-term securities.

Premium - The amount by which the price paid for a security exceeds the security’s par value.

Primary Government Dealer – A well-capitalized securities brokerage firm that is required to participate in U.S. Treasury auctions of its debt instruments.

Principal - The face value or par value of a debt instrument. It may also refer to the amount of capital invested in a given security.

IntraFi – A private sector firm that places time deposits (“CDs”), with participating Insured Institutions through IntraFi’s CDARS. California Government Code Sections 53601.8 and 53635.8 permit the City to place funds for the purchase of time deposits with Insured Institutions through private sector firms such as IntraFi’s Network.

Prospectus - A legal document that must be provided to any prospective purchaser of a new securities offering registered with the SEC. This can include information on the issuer, the issuer’s business, the proposed use of proceeds, the experience of the issuer’s management, and certain certified financial statements.

Prudent Person Rule - An investment standard outlining the fiduciary responsibilities of public funds investors relating to investment practices.

Range Note – Investment whose coupon payment varies depending on whether the current benchmark falls within a specified range. If it does not, then there is no requirement to pay any interest at all. Range notes have a high coupon as long as a market index remains below a specified level or within a specified range, but a zero percent coupon if it does not.

Regular Way Delivery – Securities settlement that calls for delivery and payment on the first business day following the trade date (T+1). Mutual funds are settled on a same day basis; government securities are settled on the next business day.

Reinvestment Risk - The risk that a fixed-income investor will be unable to reinvest income proceeds from a security holding at the same rate of return currently generated by that holding.

Repurchase Agreement (repo RP) - An agreement of one party to sell securities at a specified price



to a second party and a simultaneous agreement of the first party to repurchase the securities at a specified price or at a specified later date.

Return on Investment – Interest earnings on other gains as measured a percentage basis with respect to the amount of the investment.

Reverse Repurchase Agreement (Reverse Repo) - An agreement of one party to purchase securities at a specified price from a second party and a simultaneous agreement by the first party to resell the securities at a specified price to the second party on demand or at a specified date.

Rule 2a-7 of the Investment Company Act - Applies to all money market mutual funds and mandates such funds to maintain certain standards, including a 13- month maturity limit and a 90-day average maturity on investments, to help maintain a constant net asset value of one dollar (\$1.00).

Safekeeping - Holding of assets (e.g., securities) by a financial institution.

Securities Lending Agreement – Agreement between investors and other owners of securities to lend them to broker-dealers and other institutions for short periods of time, in exchange for a negotiable fee.

Safety – An objective of portfolio management. Most often refers to maintenance of principal or the prevention of the loss of capital.

Selected depository institution- as defined by California GC Sections 53601.8(a) and 53635.8 (a), a nationally or state chartered commercial bank, savings bank, savings and loan association, or credit union within California, that has been contracted by a local agency, to submit local agency funds to a private sector entity that assists in the placement of certificates of deposit (time deposits) with other commercial banks, savings banks, savings and loan associations, or credit unions that are located in the United States, for the local agency's account. The selected depository institution shall serve as a custodian for each certificate of deposit that is issued with the placement service for the local agency's account.

SMDIA- Standard Maximum Deposit Insurance Amount. This term is defined by IntraFi as the current FDIC limit of \$250,000 per account deposited in a bank account and insured by the FDIC against loss of principal.

Surplus Funds – As specified in State law, funds which are not required for the immediate needs of the local agency. The City may invest any portion of these funds it deems wise or expedient in investments set forth in this Policy. See III. A. 1.a. (Contrast operating funds.)

Swap - Trading one asset for another.

Term Bond - Bonds comprising a large part or all of a particular issue which comes due in a single maturity. The issuer usually agrees to make periodic payments into a sinking fund for mandatory redemption of term bonds before maturity.

Total Return - The sum of all investment income plus changes in the capital value of the portfolio. For mutual funds, return on an investment is composed of share price appreciation plus any realized



dividends or capital gains. This is calculated by taking the following components during a certain time period. (Price Appreciation) + (Dividends paid) + (Capital gains) = Total Return

Treasury Bills - Short-term, non-interest-bearing U.S. government debt securities with maturities of no longer than one year and issued in minimum denominations of \$10,000. Auctions of three- and six-month bills are weekly, while auctions of one-year bills are monthly. The yields on these bills are monitored closely in the money markets for signs of interest rate trends.

Treasury Notes - Intermediate U.S. government debt securities with maturities of one to 10 years and issued in denominations ranging from \$1,000 to \$1 million or more.

Treasury Bonds - Long-term U.S. government debt securities with maturities often years or longer and issued in minimum denominations of \$1,000. Currently, the longest outstanding maturity for such securities is 30 years.

Uniform Net Capital Rule - SEC Rule 15C3-1 outlining capital requirements for broker/dealers.

Volatility - A degree of fluctuation in the price and valuation of securities.

Weighted Average Maturity (WAM) - The average maturity of all the securities that comprise a portfolio. According to SEC rule 2a-7, the WAM for SEC registered money market mutual funds may not exceed 90 days and no one security may have a maturity that exceeds 397 days.

When Issued (WI) - A conditional transaction in which an authorized new security has not been issued. All "when issued" transactions are settled when the actual security is issued.

Yield - The current rate of return on an investment security generally expressed as a percentage of the security's current price.

Yield-to-call (YTC) - The rate of return an investor earns from a bond assuming the bond is redeemed (called) prior to its nominal maturity date.

Yield Curve - A graphic representation that depicts the relationship at a given point in time between yields and maturity for bonds that are identical in every way except maturity. A normal yield curve may be alternatively referred to as a positive yield curve.

Yield-to-maturity - The rate of return yielded by a debt security held to maturity when both interest payments and the investor's potential capital gain or loss are included in the calculation of return.

Zero-coupon Securities - Security that is issued at a discount and makes no periodic interest payments. The rate of return consists of a gradual accretion of the principal of the security and is payable at par upon maturity.

APPENDIX D
INVESTMENT POLICY STATE-FRESNO LIMITS BY INVESTMENT TYPE

Authorized Investments	Maximum Maturity	Quality Rating	Maximum % Limit Of Portfolio State	Maximum % Limit Of Portfolio Fresno	Maximum % Limit Of Portfolio Per Single Issuer State	Maximum % Limit Of Portfolio Per Single Issuer Fresno	Maximum % of Single Issuer's Debt State/Fresno
City of Fresno Debt	5 Years	N/A	100%	100%	100%	100%	100%
U.S. Treasuries	5 Years	N/A	100%	100%	100%	100%	100%
California Debt	5 Years	N/A	100%	100%	100%	100%	100%
Other 49 States Debt	5 Years	N/A	100%	100%	100%	100%	100%
Cal Local Agency Debt	5 Years	N/A	100%	100%	100%	100%	100%
GSE Agencies	5 Years	N/A	100%	70%	100%	50%	100%
Banker's Acceptances	180 Days	N/A	40%	40%	30%	30%	100%
Commercial Paper	397 Days	A-1/P-1	40%	25%	25%	25%	10%
Certificates of Deposit	5 Years	Insured	30%	30%	30%	30%	Shareholders Equity
Negotiable CDs	5 Years	N/A	30%	30%	30%	30%	Shareholders Equity
Time Deposits	5 Years	Collateral	100%	100%	100%	100%	Shareholders Equity
Shares of Section 6509.7 JPAs	N/A	N/A	100%	100%	100%	100%	100%
GC 53601.8 CDs	5 Years	Insured	30%	30%	30%	30%	Shareholders Equity
Repurchase Agmnts	1 Year	Collateral	100%	100%	100%	100%	100%
Reverse Repurchase Agmnts	92 Days	N/A	20%	20%	N/A	N/A	100%
Securities Lending Agmnts	92 Days	N/A	20%	20%	N/A	N/A	100%
Medium-Term Notes	5 Years	A	30%	30%	30%	20%	100%
Mutual Funds	N/A	AAA	20%	20%	10%	10%	100%
Money Market Funds	N/A	AAA	20%	20%	20%	20%	100%
Mortgage/Asset Backed Debt	5 Years	AA	20%	20%	20%	20%	100%
LAIF	N/A	N/A	100%	100%	100%	100%	100%
Supranational Organizations	5 Years	AA	30%	30%	30%	30%	100%





June 23, 2026

Council Adoption: 06/23/2026

Mayor Approval:

Mayor Veto:

Override Request:

TO: MAYOR JERRY DYER

FROM: *BL* AMY K. ALLER
City Clerk

SUBJECT: TRANSMITTAL OF COUNCIL ACTION FOR APPROVAL OR VETO

At the City Council meeting of June 23, 2026, Council adopted the attached Resolution No. 2026-161 *****RESOLUTION - To Adopt an Investment Policy for Public Funds for Fiscal Year 2026-2027 (Subject to Mayor's Veto)**. 9:00 AM-E, File ID 26-801 by the following vote:

Ayes : Perea, Karbassi, Arias, Maxwell, Vang, Richardson, Esparza
Noes : None
Absent : None
Abstain : None

Please indicate either your formal approval or veto by completing the following sections and executing and dating your action. Please file the completed memo with the Clerk's office on or before July 3, 2026. In computing the ten day period required by Charter, the first day has been excluded and the tenth day has been included unless the 10th day is a Saturday, Sunday, or holiday, in which case it has also been excluded. Failure to file this memo with the Clerk's office within the required time limit shall constitute approval of the ordinance, resolution or action, and it shall take effect without the Mayor's signed approval.

APPROVED / NO RETURN:

VETOED for the following reasons: (Written objections are required by Charter; attach additional sheets if necessary.)


Jerry Dyer, Mayor

Date: 6/26/26

COUNCIL OVERRIDE ACTION:

Ayes :
Noes :
Absent :
Abstain :

Date: _____

RECEIVED
2026 JUN 26 PM 1:13
CITY OF FRESNO
CITY CLERK'S OFFICE