

**COUNTY OF SAN LUIS OBISPO BOARD OF SUPERVISORS
AGENDA ITEM TRANSMITTAL**

(1) DEPARTMENT Treasurer, Tax Collector, Public Administrator		(2) MEETING DATE January 10, 2006		(3) CONTACT/PHONE Donna Morris (805) 781-5888 Frank L. Freitas (805) 781-5843	
(4) SUBJECT Presentation of the County Treasury Oversight Committee Annual Investment Policy Compliance Audit Report for the fiscal year ended June 30, 2005; the County Treasury Investment Policy for Calendar Year 2006; and Confirmation of Nominees to the County Treasury Oversight Committee for Calendar Year 2006.					
(5) SUMMARY OF REQUEST The County Treasury Oversight Committee (CTOC) was established in 1996 in accordance with new investment legislation. The duties of CTOC include causing an annual Investment Policy compliance audit for presentation to the Board of Supervisors. The San Luis Obispo County Treasurer established the written Investment Policy in May 1983. This policy is revised annually. Since the creation of CTOC in 1996, the policy has also been reviewed annually by its members. The County Treasurer requests approval of the Investment Policy for 2006. The members of CTOC must be confirmed each year in accordance with Board resolution. Nominees from five categories were selected for your Board's confirmation. The CTOC duties include reviewing the policies that guide the investment of combined pool funds and causing an independent audit of the County Treasurer's combined pool investments. Attached for your review are the Audit Report, the Investment Policy, and the CTOC Applications for Nomination.					
(6) RECOMMENDED ACTION It is recommended that your Honorable Board receive and file the Annual Investment Policy Compliance Audit Report; approve the Investment Policy for Calendar Year 2006, and confirm Clark Channing, Jim Grant, Mary Jarvis, Russell Miller, and Gere W. Sibbach as members of the County Treasury Oversight Committee for the 2006 calendar year.					
(7) FUNDING SOURCE(S) N/A		(8) CURRENT YEAR COST N/A		(9) ANNUAL COST N/A	
(10) BUDGETED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> N/A <input type="checkbox"/> NO					
(11) OTHER AGENCY/ADVISORY GROUP INVOLVEMENT (LIST): The County Auditor-Controller, County Administrative Office, and County Office of Education.					
(12) WILL REQUEST REQUIRE ADDITIONAL STAFF? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, How Many? _____ <input type="checkbox"/> Permanent _____ <input type="checkbox"/> Limited Term _____ <input type="checkbox"/> Contract _____ <input type="checkbox"/> Temporary Help _____					
(13) SUPERVISOR DISTRICT(S) 1st, 2nd, 3rd, 4th, 5th, <u>(All)</u>			(14) LOCATION MAP <input type="checkbox"/> Attached <input type="checkbox"/> N/A		
(15) AGENDA PLACEMENT <input type="checkbox"/> Consent <input type="checkbox"/> Hearing (Time Est. _____) <input type="checkbox"/> Presentation <input checked="" type="checkbox"/> Board Business (Time Est. <u>15</u>)			(16) EXECUTED DOCUMENTS <input type="checkbox"/> Resolutions (Orig + 4 copies) <input type="checkbox"/> Contracts (Orig + 4 copies) <input type="checkbox"/> Ordinances (Orig + 4 copies) <input checked="" type="checkbox"/> N/A		
(17) NEED EXTRA EXECUTED COPIES? <input type="checkbox"/> Number: _____ <input type="checkbox"/> Attached <input checked="" type="checkbox"/> N/A			(18) APPROPRIATION TRANSFER REQUIRED? <input type="checkbox"/> Submitted <input type="checkbox"/> 4/5th's Vote Required <input checked="" type="checkbox"/> N/A		

(19) ADMINISTRATIVE OFFICE REVIEW	<div style="text-align: right; font-size: 2em; font-weight: bold; margin-bottom: 5px;">E-1</div> <div style="text-align: right; font-size: 1.5em; font-weight: bold; margin-bottom: 5px;">1-10-06</div> <div style="text-align: center; font-size: 1.5em; font-weight: bold;">OK Leslie Brown</div>
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SAN LUIS OBISPO COUNTY
TREASURY OVERSIGHT COMMITTEE (CTOC)

Mary Jarvis, Chairperson
Russell Miller, Vice Chairperson



TO: HONORABLE BOARD OF SUPERVISORS

**FROM: COUNTY TREASURY OVERSIGHT COMMITTEE
MARY JARVIS, CHAIRPERSON**

DATE: JANUARY 10, 2006

**SUBJECT: PRESENTATION OF ANNUAL INVESTMENT POLICY COMPLIANCE AUDIT
REPORT FISCAL YEAR ENDED JUNE 30, 2005**

M. Jarvis

Recommendation

It is recommended that your Honorable Board receive, review, and file the attached Investment Policy Compliance Audit Report for the fiscal year ended June 30, 2005.

Discussion

The County Treasury Oversight Committee (CTOC) was established in 1996, to promote the public interest by involving Treasury pool participants and a member of the public in the oversight of the County Treasury. One of the duties of the CTOC is to cause an annual audit to be conducted to determine the County Treasurer's compliance with the Investment Policy. To comply with this requirement for fiscal year 2004-05, the CTOC entered into an agreement with the County Auditor-Controller.

The County Auditor-Controller reports that "In our opinion, we found the Treasurer's Investment Policy to be complete and the San Luis Obispo County Treasurer to be in compliance, in all material respects, with the Investment Policy for the fiscal year ended June 30, 2005."

Other Agency Involvement/Impact

The Investment Policy Compliance Audit Report was prepared by the County Auditor-Controller's Office. The audit report was presented at the November 9, 2005, CTOC meeting where it was reviewed and approved.

Financial Consideration

There are no additional financial considerations associated with this audit report.

Results

One of the goals of the County Treasurer is to manage the investment pool in a manner that ensures the preservation of capital and provides the ability to meet the cash flow needs of the investment pool participants. The Investment Policy Compliance Audit Report is an indicator that this goal is being met and provides information to the Board of Supervisors and the public regarding Investment Policy compliance when investing public funds.

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County of San Luis Obispo
Office of the Auditor-Controller
Room D220 County Government Center
1055 Monterey Street
San Luis Obispo, California 93408
(805) 781-5040 FAX (805) 781-1220



GERE W. SIBBACH, CPA
Auditor-Controller
BILL ESTRADA
Assistant

September 15, 2005

San Luis Obispo County Treasury Oversight Committee
c/o Frank L. Freitas, San Luis Obispo County Treasurer, Tax Collector
County Government Center, Room D290
San Luis Obispo, California 93408

Dear Sirs:

Our office recently completed a compliance audit of the San Luis Obispo County Treasurer's Investment Policy for the fiscal year ended June 30, 2005.

Purpose

The purpose of our audit was to determine if the San Luis Obispo County Treasurer is in compliance with the Treasurer's Investment Policy as directed by Government Section 27133 and 27131.

Scope

Our audit of the Treasurer's Investment Policy included a review of the County Treasury Oversight Committee (CTOC) Handbook, including the examination of minutes from the CTOC quarterly meetings and the newest members application for membership to the Committee.

The Treasurer is directed to prepare and distribute quarterly reports by Board of Supervisors Resolution 96-48. The quarterly reports were reviewed by our office to determine if they were filed timely, if the information contained was complete, and the investments represented were accurately valued.

In addition, we performed quarterly unannounced cash counts as identified in the Treasurer's Investment Policy. These cash counts included verifying that investments were issued from approved lists, recalculating the carrying value of selected instruments, and confirming all major investments and a sampling of smaller investments with banks.

Summary

In our opinion, we found the Treasurer's Investment Policy to be complete and the San Luis Obispo County Treasurer to be in compliance, in all material respects, with the Investment Policy for the fiscal year ended June 30, 2005.

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We would like to thank the County Treasurer and his staff for their cooperation during our audit.

Sincerely,

Gere W. Sibbach, CPA
Auditor-Controller



Bill Estrada
Assistant Auditor - Controller

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**Treasurer
Tax Collector
Public Administrator
SAN LUIS OBISPO COUNTY**

Frank L. Freitas, CPA
Department Head

Donna L. Morris
Assistant

P.O. Box 1149 • Room D-290, County Government Center • San Luis Obispo, CA 93406-1149

- Phone 805.781.5842
- Fax 805.781.1079
- Email ttc@co.slo.ca.us

TO: Honorable Board of Supervisors

**FROM: Frank L. Freitas, CPA
Treasurer, Tax Collector, Public Administrator**

DATE: January 10, 2006

SUBJECT: County Treasury Investment Policy for Calendar Year 2006

Recommendation

It is recommended that your Honorable Board review and approve the County Treasury Investment Policy for the calendar year 2006.

Discussion

The written Investment Policy was established in May 1983 by the County Treasurer to clearly state investment guidelines for the protection of funds. This policy has been revised over the last 22 years. However, the purpose and objectives have not changed as stated in the 2006 Investment Policy:

Purpose: "The purpose of this written Investment Policy (IP) is to clearly state the guidelines and standards established by the San Luis Obispo County Treasurer for the prudent investment of the combined pool, define the objectives of managing the combined pool, and maintain internal controls and reporting requirements."

Objectives: The primary objectives in order of priority are safety, liquidity, and yield, while maintaining compliance with federal, state, and local laws and regulations.

The Investment Policy is revised at least annually. Revisions to the Investment Policy are presented to the County Treasury Oversight Committee, and then presented to your Honorable Board for final approval.

The Investment Policy for calendar year 2006 has been enhanced to further meet the needs of the County Treasurer and the pool participants and at the same time meet standards established by the investment industry and government codes. The modifications for calendar year 2006 are for clarification purposes only and did not significantly modify any condition for making investments.

The County Treasurer's Investment Pool is rated '**AA+/V1+**' by Fitch Ratings, a Nationally Recognized Statistical Rating Organization. The Investment Pool has received and maintained this highest rating by Fitch since 1995. Investment pools rated 'AAA' meet the highest credit quality standards for underlying assets, diversification, management, and operational capabilities. The pool's 'V1+' volatility rating reflects low market risk and a strong capacity to return stable principal values to participants, even in severely adverse interest rate environments. Portfolio valuation reports are submitted to Fitch Ratings monthly. The Fitch Ratings reports are available on the department's website at www.slocountytax.org.

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Other Agency Involvement/Impact

The changes to the Investment Policy were approved on November 9, 2005, by the County Treasury Oversight Committee which includes representatives from the County Auditor-Controller, the County Board of Supervisors, the County Office of Education, the County School and Community College Districts, and a member of the public. All agencies with funds in the County Treasury will continue to be protected by the Investment Policy.

Financial Consideration

Since 1983, the Treasurer's Investment Policy has provided an important foundation for maintaining the safety of funds in the investment pool. The recommended changes will contribute to the safety of the Treasury investments. There are no costs associated with these Investment Policy changes.

Results

One of the goals of the County Treasury is to manage the investment pool in a manner that ensures the preservation of capital and provides the ability to meet the cash flow needs of the investment pool participants. The 2006 Investment Policy will further enhance the Treasurer's ability to attain this goal.

In addition, the Investment Policy provides information to the Board of Supervisors and the public regarding the strict control exercised by the County Treasurer over the investment of public funds. The approved Investment Policy will be available on the department's website at www.slocountytax.org.

c: Gere W. Sibbach, Auditor-Controller

Attachment: Proposed County Treasury Investment Policy for Calendar Year 2006

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

I. POLICY STATEMENT

The San Luis Obispo County Treasurer shall prudently manage County funds and funds of local agencies in the combined pool pursuant to the defined objectives which, in the order of priority, are safety, liquidity, and yield, while in compliance with laws and policies.

The purpose of this written Investment Policy (*IP*) is to clearly state the guidelines and standards established by the San Luis Obispo County Treasurer for the prudent investment of the combined pool, define the objectives of managing the combined pool, ~~establish benchmarks of measuring not only results and performance, but also whether the portfolio meets the *IP* requirements,~~ and maintain internal controls and reporting requirements.

The funds are managed with a high degree of care and prudence. Though all investments contain a degree of "risk," the proper exercise of prudence, the maintenance of a high level of ethical standards, and the proper delegation of authority reduces the potential for any realized loss.

This *IP* establishes the standards under which the County Treasurer shall conduct business with financial institutions with regard to the investment process. These standards establish the basis for the investment program.

II. SCOPE

This policy is intended to cover all investment activities under the direct authority of the County Treasurer. The County maintains a combined pool with cash and investments which provide cash flow for the funding needs of the participants. Participants include County departments, agencies, schools, and special districts. A list of all participants is maintained by fund through the County Auditor-Controller's ~~Financial Management System~~ *enterprise financial system*. Normal banking processes, standards, and relationships are defined by the California Government Code (GC) and are not a part of the *IP*.

III. OBJECTIVES

The primary objectives **in order of priority** are safety, liquidity, and yield, while maintaining compliance with federal, state, and local laws and regulations.

A. SAFETY

The combined pool shall be managed in a manner that ensures the preservation of capital. The objective is to minimize credit risk and interest rate risk.

1. ~~Credit Risk~~

~~Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. Credit risk may be minimized by:~~

- ~~a. Limiting investments to the safest types of securities.~~
- ~~b. Pre-qualifying the financial institutions.~~

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San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

e. ~~Diversifying the portfolio.~~

1. Credit Risk

Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations.

a. Custodial Credit Risk

Custodial credit risk for investments is the risk that in the event of the failure of the counterparty to a transaction, a government will not be able to recover the value of investment or collateral securities that are in the possession of an outside party.

This type of credit risk can be minimized by:

- (1) *Pre-qualifying custody financial institutions.*
- (2) *Requiring custodian to hold securities in the County Treasurer's name.*
- (3) *Holding applicable securities in the County Treasurer's vault.*

b. Concentration of Credit Risk

Concentration of credit risk is the risk of loss attributed to the magnitude of a government's investment in a single issuer.

This type of credit risk can be minimized by:

- (1) *Limiting investments to the safest types of securities.*
- (2) *Diversifying the portfolio.*

2. Interest Rate Risk

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. Interest rate risk may be minimized by structuring the portfolio so that securities mature to meet cash flow requirements for ongoing operations, and thereby avoiding the need to sell securities on the open market prior to maturity.

B. LIQUIDITY

The combined pool shall remain sufficiently liquid to meet all operating requirements. This will be accomplished by structuring the portfolio so that maturities meet cash flow requirements. The combined pool shall include marketable securities to assist in meeting unanticipated cash requirements.

C. YIELD

Each purchase made shall be subject to meeting the requirements of safety, liquidity, and competitive pricing.

D. COMPLIANCE

This *IP* is written to be in compliance with federal, state, and local laws and regulations. The combined pool is managed in compliance with this policy and applicable law. Whenever laws change, any affected section in this policy shall automatically change in application to conform to law.

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

IV. STANDARDS OF CARE

A. PRUDENCE

The County Treasury shall manage the combined pool pursuant to the "Prudent Investor Standard" (GC §27000.3(c)):

When investing, reinvesting, purchasing, acquiring, exchanging, selling, or managing public funds, the county treasurer or the board of supervisors, as applicable, shall act with care, skill, prudence, and diligence under the circumstances then prevailing, specifically including, but not limited to, the general economic conditions and the anticipated needs of the county and other depositors, 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 county and the other depositors. Within the limitations of this section and considering individual investments as part of an overall investment strategy, investments may be acquired as authorized by law.

Investment personnel, while exercising due diligence and acting *in compliance with federal, state, and local laws and regulations* in accordance with the County Treasurer's written policies and procedures, and this *IP*, shall be relieved of personal responsibility for credit risks provided that deviations from expectations are reported in a timely manner. This could involve reporting a credit rating downgrade on an investment held by the Treasury. Often such credit downgrades foreshadow looming credit risks. Such information should be reported immediately to the County Treasurer and Assistant Treasurer.

B. DELEGATION OF AUTHORITY

California Government Code authorizes the County Treasurer to deposit, invest, and provide safekeeping for funds held in the County Treasury. The County Treasurer may delegate this authority to one or more deputy Treasurers, including the Assistant Treasurer, or other qualified management level employee; or to a qualified investment service organization.

No person may engage in an investment transaction except when delegated to do so by the County Treasurer and only as provided under the terms of this policy and the procedures established and approved by the County Treasurer. A list of authorized County investment personnel is maintained with authorized financial dealers and institutions. The County Treasurer shall maintain a system of internal controls to regulate the activities of investment personnel.

C. ETHICS AND CONFLICTS OF INTEREST

Individuals performing the investment function and members of the County

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San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

Treasury Oversight Committee (CTOC) shall maintain the highest standards of conduct. Each person performing the investment function and members of the CTOC must maintain their independence and not have actual conflicts of interest. In addition, they shall avoid the appearance of having conflicts of interest or having lack of independence. Therefore, County Treasury investment personnel and members of the CTOC are subject to the following prohibitions and disclosures:

1. Prohibitions

- a. 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 affect their ability to make impartial decisions.
- b. Officers and employees shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the County.
- c. Investment personnel shall not accept gifts or gratuities from any bank, broker, dealer, or any other person, firm, or organization with which the County conducts business. Exceptions may be made for minor items of advertising, ~~i.e., pens, calendars, etc., which are~~ *and other items* of minimal value with the approval of the County Treasurer.

2. Disclosures

Investment personnel shall disclose any material interest in financial institutions with which they conduct County business. They shall further disclose any personal financial/investment positions that could create the appearance of lack of independence.

Nothing in this IP supersedes any County ordinance or State law which regulates conduct. This policy may set standards higher than those established by ordinances or other laws.

V. AUTHORIZED FINANCIAL DEALERS AND INSTITUTIONS

A. SELECTION STANDARDS

The County Treasurer, in selecting financial institutions for the investment of funds, shall consider and monitor the credit worthiness of each institution. The County Treasurer shall approve each institution maintained on the authorized list which he determines is in the best interest of the County. In addition, organizations selected for the list must meet the following criteria:

1. Listed as a "Primary Dealer" by the Federal Reserve Bank of New York, or
2. A Nationally or State Chartered Bank with assets over five billion dollars (\$5,000,000,000), and has received an overall rating of not less than "satisfactory" in its most recent evaluation by the appropriate federal

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San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

- financial supervisorial agency of its record of meeting the credit needs of California's communities, including low and moderate income neighborhoods, pursuant to governmental regulations, or
3. Issuer of commercial paper whose commercial paper meets the requirements established in the California Government Code.

B. CRITERIA FOR SELECTING SECURITY BROKERS AND DEALERS

1. The criteria shall prohibit the selection of any broker, brokerage, dealer, or securities firm that has, within any consecutive 48-month period following January 1, 1996, made a political contribution in an amount exceeding the limitations contained in Rule G-37 of the Municipal Securities Rulemaking Board, to the County Treasurer, any member of the governing board of the County or depositing local agency, or any candidate for those offices.
2. All financial institutions and broker/dealers who desire to become qualified bidders for investment transactions must meet the following conditions as appropriate:
 - a. Complete all investment transactions in a timely manner.
 - b. Maintain the normal and accepted industry standards for doing business.
 - c. Meet or exceed the minimum SELECTION STANDARDS identified under this policy.
 - d. Agree not to provide any honoraria, gift, or gratuity to any San Luis Obispo County investment personnel or to any member of the CTOC. *Exceptions may be made for minor items of advertising and other items of minimal value with the approval of the County Treasurer.*
 - e. Agree to comply with this *IP* (except for requirements related to Average Maturities, Category Limits, or Issuer Limits which may change daily).

C. AUTHORIZED BROKER/DEALER CONTACT LIST REVIEW

The County Treasurer, or the designee, shall periodically review the authorized list. The County Treasurer shall continue to maintain the financial institutions on the authorized broker/dealer contact list which he determines is in the best interest of the County.

VI. CUSTODIAL SERVICES

Custodial services shall be maintained at the following standards:

A. THIRD PARTY

Securities purchased from any bank or dealer, including appropriate collateral (as defined by State law) shall be placed with an independent third party for custodial safekeeping. The third party custodian is selected based on rating, experience, and service.

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San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

B. ACCOUNTING

Monthly safekeeping statements are received from banks where securities are held. Authorized staff, not directly supervised by investment personnel, shall compare the safekeeping statements with the statements generated by the investment tracking system utilized by the County Treasurer.

C. VAULT SAFEKEEPING

Collateralized certificates of deposits shall be safe kept in the County Treasurer's vault.

D. TRANSACTIONS FOR INVESTMENTS

1. A list of individuals and their signatures, who are authorized to handle investment transactions and wire transfers, shall be provided to the safekeeping institution and the depository bank.
2. Trade instructions to the safekeeping institution shall be made for all investment purchases or sale transactions, either by electronic transmission or facsimile.

E. DELIVERY VS. PAYMENT

All trades, where applicable, shall be executed by delivery vs. payment (DVP). This ensures that securities are deposited in the eligible financial institution prior to the release of funds.

VII. INTERNAL CONTROLS

A. INTERNAL CONTROL STRUCTURE

An internal control structure shall be established and maintained that is appropriate for the circumstances. The internal controls shall be designed to provide reasonable assurances that the combined pool assets are protected.

B. INTERNAL CONTROL STANDARD

The concept of reasonable assurance recognizes that the cost of control should not exceed the benefits likely to be derived.

C. INTERNAL CONTROL REVIEW

Reviews of the internal controls shall be made to ensure:

1. Separation of transaction authority from accounting and record keeping.
2. Daily investment activity and preparation of investment tickets and trade instructions to custody shall be handled by designated investment personnel.
3. Broker investment confirmations shall be reviewed and compared to the investment tracking system by designated staff not directly supervised by investment personnel. Discrepancies shall be referred *immediately* to the Assistant Treasurer (provided that the Assistant Treasurer did not execute the transaction) or the County Treasurer

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

VIII. EXTERNAL REVIEW

A. QUARTERLY REVIEW

1. The CTOC meets within 45 days after the end of each quarter to review the County Treasurer's Quarterly Report for consistency and compliance with the *IP*.
2. Quarterly, the County Auditor-Controller performs a cash audit of the County Treasury. This audit verifies the financial status and confirms compliance with ~~California Law~~ *federal, state, local laws and regulations*, and the *IP*.

B. ANNUAL REVIEW

1. The CTOC is required to review and monitor the *IP*. To ensure compliance, the CTOC shall cause an annual *IP* compliance audit by contracting the services of the County Auditor-Controller, the County's contracted auditors, an independent certified public accountant separately contracted by the CTOC, or any combination thereof. Results of this audit shall be presented to the County Board of Supervisors.
2. To ensure compliance with the law and County policies and procedures, the County Auditor-Controller annually audits the County, including the office of County Treasurer.
3. Independent certified public accountants selected by the Board of Supervisors and the Grand Jury perform an annual audit of the books of accounts, financial records, and transactions of all offices of the County.
4. The *IP* is presented annually to the County Board of Supervisors for their review and approval at a public meeting.

IX. RESTRICTIONS APPLICABLE TO ALL INVESTMENTS

The following restrictions apply to all investments purchased on behalf of the County Treasurer:

A. INVESTMENT ORIGINATION

Investment transactions shall originate at the office of the County Treasurer. Investment transactions originating at a location other than the office of County Treasurer must have the specific written approval of the County Treasurer.

B. AUTHORIZED PERSONNEL

All investment transactions shall only be made by personnel authorized by the County Treasurer.

C. COMPETITIVE PROCESS

All investment transactions shall be made on an informal competitive bid basis, unless impractical. The County Treasurer shall be notified when noncompetitive purchases are necessary.

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

D. HOLDING TO MATURITY

Investments are to be purchased with the intent of holding the security to

maturity. Trading of any security before maturity requires written authorization by the County Treasurer.

E. AUTHORIZATION

All investments purchased must be authorized by and are subject to the limitations of this *IP* and the County Treasurer's written policies and procedures. All purchases must be completed through financial institutions authorized by the County Treasurer.

F. MAXIMUM MATURITY

All investments, unless otherwise restricted, shall not exceed a maturity of five years without written approval of the County Treasurer, and only when in compliance with California law.

G. APPROVED SECURITIES

The County Treasurer shall maintain a method of internal control to ensure that appropriate investments are purchased.

H. PERCENTAGE LIMITATIONS

Where a percentage limitation is specified for a particular category of investment, that percentage is applicable only at the date of purchase.

I. HOLIDAYS AND OTHER NON-WORK DAYS

When any maturity has a maximum time limit and that date falls on a week-end or bank holiday, the number of days calculated shall be based on counting all the days to the first working day past the maturity date.

J. COLLATERALIZATION

Collateral taken on investments shall be priced at market value and must equal or exceed the amount required by law. Full collateralization is required on repurchase agreements and collateralized certificates of deposit. The collateral requirement, with respect to collateralized certificates of deposit that are covered under the FDIC program, are exempt to the amount covered.

~~**K. DERIVATIVES**~~

~~Derivatives described under GC §53601.6 are prohibited~~

K. DERIVATIVES

*Derivatives which include inverse floaters, range notes, or mortgage-derived, interest-only strips and any security that could result in zero interest accrual if held to maturity are **prohibited**.*

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

L. FORM OF CURRENCY

All investments will be U.S. dollar denominated.

M. CALLABLE SECURITIES

Callable securities are redeemable by the issuer before the scheduled maturity. Callable investments are only allowable with the specific written approval of the County Treasurer for each investment.

X. GENERAL INVESTMENT PARAMETERS

A. DIVERSIFICATION

Investments shall be diversified by security type and institution to avoid losses that may be associated with either.

B. MATURITIES

After determination that anticipated cash flow requirements are funded, maturities will be scheduled in line with the current investment strategy.

C. REPORTING

1. A summary of all new investment transactions shall be recorded on the Treasurer's Daily Report (TDR), a copy of which is filed daily with the County Auditor-Controller.
2. Quarterly reports shall be produced and distributed in accordance with California law and by resolutions of the County Board of Supervisors. The report shall be distributed as follows:
 - a. The County Treasurer shall render a Quarterly Report to the County Administrative Officer, County Auditor-Controller, and the County Board of Supervisors within 30 days following the end of the quarter covered by the report.
 - b. The County Treasurer shall provide the CTC with the Quarterly Report prior to their scheduled quarterly meeting covered by that report.
 - c. The County Treasurer may include the Quarterly Report on the Board of Supervisors agenda within 60 days following the end of the quarter covered by the report.
 - d. The County Treasurer shall provide pool participants that report to a separate board, i.e., school districts and special districts, a Quarterly Report of Combined Pool Investments within 20 days following the end of the quarter covered by the report.
 - e. The County Treasurer shall render to the California Debt and Investment Advisory Commission (CDIAC) the Quarterly Report of the second and fourth quarters of each calendar year within 60 days following the end of the quarter covered by the report.

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3. *An annual report of Cash and Investments with deposit and investment risk disclosures is prepared for the County Auditor-Controller's Comprehensive Annual Financial Report which is audited by independent certified public accountants.*
4. *Market value reporting shall be provided in accordance with California law. When reports issued include market values of securities held, the source of those values shall be from the custodian bank; or estimates of values received from broker/dealers; or listings in the Wall Street Journal (WSJ); or internal calculations based on the current market rate for a specific treasury instrument as identified in the County Treasurer's written policies and procedures, and adjusted for estimated spreads to that instrument; or any combination of the above.*

D. PERFORMANCE STANDARDS

The combined pool shall be managed in accordance with *all applicable laws and with the standards established under this IP and the County Treasurer's written policies and procedures.* The County Treasurer shall take appropriate steps to monitor the investment program.

~~**E. MARKET VALUE REPORTING**~~

~~Market value reporting shall be provided in accordance with California law and Section X. C. of this policy.~~

E. PROCEEDS FROM THE ISSUANCE OF DEBT

Proceeds shall be invested according to the limitations of California law and appropriate issuing documents.

F. SPECIFIC INVESTMENTS

Specific investments requested by participant depositors may be made on behalf of the participant depositor, subject to the terms and conditions agreed upon by the County Treasurer and the participant depositor.

XI. AUTHORIZED INVESTMENTS – RESTRICTIONS AND/OR CONDITIONS

All investments must be made subject to California and Federal law. It is the intent of this *IP* to further restrict allowable investments for the combined pool to reduce exposure to investment risks. The following investments are authorized by California law and may be permitted by this *IP*, subject to the listed restrictions:

- A. BONDS ISSUED BY THE LOCAL AGENCY**, 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.

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OFFICE RESTRICTIONS: Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.

- B. 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. The following instruments are permitted with the indicated restrictions:

1. TREASURY NOTES

OFFICE RESTRICTIONS: Maximum term five years and limited to 50 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures.

2. TREASURY BONDS

OFFICE RESTRICTIONS: Maximum term five years and limited to 50 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures.

3. TREASURY BILLS

OFFICE RESTRICTIONS: No percentage limit, but subject to limitations identified in the County Treasurer's written policies and procedures.

- C. REGISTERED STATE WARRANTS**, or treasury notes, or bonds of this state, including bonds payable solely out of the revenues from a revenue-producing property owned, controlled, or operated by the state or by a department, board, agency, or authority of the state.

OFFICE RESTRICTIONS: Maximum term one year and limited to 10 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer.

- D. BONDS, NOTES, WARRANTS**, or other evidences of indebtedness of any local agency within this state, 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.

OFFICE RESTRICTIONS: Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the

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County Treasurer for each investment.

- E. FEDERAL AGENCY OR UNITED STATES GOVERNMENT-SPONSORED ENTERPRISE (GSE) OBLIGATIONS**, participations, or other instruments, including those issued by or fully guaranteed as to principal and interest by federal agencies or United States government-sponsored enterprises.

OFFICE RESTRICTIONS: Maximum term five years and limited to 25 percent of the combined pool per GSE, and subject to limitations identified in the County Treasurer's written policies and procedures.

- F. BANKERS ACCEPTANCES** otherwise known as bills of exchange or time drafts drawn on and accepted by a commercial bank. The purchase of bankers acceptances is restricted by State law as follows:
Purchase of bankers acceptances may not exceed 180 days' maturity or 40 percent of the combined pool. No more than 30 percent of the combined pool may be invested in the bankers acceptances of any one commercial bank.

OFFICE RESTRICTIONS: BANKERS ACCEPTANCES – DOMESTIC

1. To be eligible for purchase, a domestic issuer of bankers acceptances must have the highest short-term credit rating of a nationally recognized statistical rating organization (NRSRO), or must have specific written approval of the County Treasurer.
2. Domestic bankers acceptances may exceed 30 percent of the combined pool on the date of purchase, only with specific written approval of the County Treasurer.
3. More than 10 percent of the combined pool may be invested in domestic bankers acceptances of any one issuer, only with specific written approval of the County Treasurer.
4. Subject to further limitations as identified in the County Treasurer's written policies and procedures.

OFFICE RESTRICTIONS: BANKERS ACCEPTANCES – FOREIGN

1. To be eligible for purchase, a foreign issuer of bankers acceptances must have the highest short-term credit rating of a NRSRO, or must have specific written approval of the County Treasurer.
2. Foreign bankers acceptances may exceed 10 percent of the combined pool on the date of purchase, only with specific written approval of the County Treasurer.
3. More than 4 percent of the combined pool may be invested in foreign bankers acceptances of any one issuer, only with specific written approval of the County Treasurer.
4. Foreign bankers acceptances may exceed 90 days to maturity, only with specific written approval of the County Treasurer.
5. Subject to further limitations as identified in the County Treasurer's written

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policies and procedures.

G. COMMERCIAL PAPER of "prime" quality of the highest ranking or of the highest letter and number rating as provided for by a NRSRO. The entity that issues the commercial paper shall meet all of the following conditions in either paragraph (1) or paragraph (2):

1. The entity meets the following criteria:
 - a. Is organized and operating in the United States as a general corporation.
 - b. Has total assets in excess of five hundred million dollars (\$500,000,000).
 - c. Has debt other than commercial paper, if any, that is rated "A" or higher by a NRSRO.
2. The entity meets the following criteria:
 - a. Is organized within the United States as a special purpose corporation, trust, or limited liability company.
 - b. Has program-wide credit enhancements including, but not limited to, overcollateralization, letters of credit, or surety bond.
 - c. Has commercial paper that is rated "A-1" or higher, or the equivalent, by a NRSRO.

Eligible commercial paper shall have a maximum maturity of 270 days or less. No more than 40 percent of the combined pool money may be invested in eligible commercial paper. No more than 10 percent of the combined pool money ~~that may be invested pursuant to this section~~ may be invested in the outstanding commercial paper of any single corporate issuer. No more than 10 percent of the outstanding commercial paper of any single corporate issuer may be purchased by the combined pool.

OFFICE RESTRICTIONS:

1. Commercial paper may exceed 15 percent of the combined pool on the date of purchase, only with specific written approval of the County Treasurer.
2. More than 5 percent of the combined pool may be invested in commercial paper of any one issuer, only with specific written approval of the County Treasurer.
3. Commercial paper may exceed 90 days to maturity, only with the specific written approval of the County Treasurer.
4. Subject to further limitations as identified in the County Treasurer's written policies and procedures.

H. CERTIFICATES OF DEPOSIT (CD's)

1. **COLLATERALIZED CERTIFICATES OF DEPOSIT (CD's)** issued by banks, have limited liquidity. Collateralized CD's may be redeemed early, but are then subject to early withdrawal penalties. Banks must maintain

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collateral in compliance with California law.

OFFICE RESTRICTIONS:

- a. The County Treasurer shall maintain a contract with each bank where these deposits are held.
- b. Collateralized CD's may exceed one year to maturity only with the specific written approval of the County Treasurer.
- c. Collateralized CD's are limited to 20 percent of the combined pool.
- d. Any one issuer is limited to 5 percent of the combined pool.
- e. Must have specific written approval of the County Treasurer for each investment.

2. **NEGOTIABLE CERTIFICATES OF DEPOSIT** issued by a nationally or state-chartered bank, a savings association or a federal association, a state or federal credit union (additional restrictions in GC §53601 (h)) or by a state-licensed branch of a foreign bank. Purchases of negotiable certificates of deposit may not exceed 30 percent of the agency's surplus money which may be invested pursuant to this *IP*.

OFFICE RESTRICTIONS: Maximum term 90 days and limited to 20 percent of the combined pool, and subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.

I. REPURCHASE AGREEMENTS, REVERSE REPURCHASE AGREEMENTS, AND SECURITIES LENDING AGREEMENTS

1. **REPURCHASE AGREEMENTS** may be made on any investment authorized in GC §53601, when the term of the agreement does not exceed one year. The market value of securities that underlay a repurchase agreement shall be valued at 102 percent or greater of the funds borrowed against those securities and the value shall be adjusted no less than quarterly. Since the market value of the underlying securities is subject to daily market fluctuations, the investments in repurchase agreements shall be in compliance if the value of the underlying securities is brought back up to 102 percent no later than the next business day.

OFFICE RESTRICTIONS:

- a. Agreements:
 - (1) A tri-party repurchase agreement between the County Treasurer, the seller, and the custodian must be on file in the County Treasurer's office before conducting repurchase transactions covered by the agreement; or
 - (2) A bi-party repurchase agreement between the County Treasurer and the seller may be implemented only with the

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specific written approval of the County Treasurer. ~~A master repurchase agreement~~ and must be on file in the County Treasurer's office before conducting repurchase transactions covered by the agreement.

- b. Must be on the County Treasurer's list of approved repurchase agreement issuers.
- c. Repurchase agreements may exceed 30 days to maturity only with the specific written approval of the County Treasurer.
- d. Limited to 15 percent of the combined pool.
- e. Subject to limitations identified in the County Treasurer's written policies and procedures.

2. REVERSE REPURCHASE AGREEMENTS are identified in GC §53601 (i).

OFFICE RESTRICTIONS: Reverse repurchase agreements are not authorized by the County Treasurer.

3. SECURITIES LENDING AGREEMENTS are identified in GC §53601 (i).

OFFICE RESTRICTIONS: Securities lending agreements are not authorized by the County Treasurer.

J. MEDIUM-TERM NOTES, defined as all corporate and depository institution debt securities with a maximum remaining maturity of five years or less, 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 "A" or better by a ~~nationally recognized rating service~~ *NRSRO*. Purchases of medium-term notes shall not include other instruments authorized and may not exceed 30 percent of the agency's money that may be invested pursuant to this *IP*.

OFFICE RESTRICTIONS: Maximum term four years, subject to limitations identified in the County Treasurer's written policies and procedures. In addition the following restrictions also apply:

1. Must be issued at a fixed rate and must be non-callable.
2. Maturities over one year must have a minimum rating of "Aa2" by Moody's, "AA" by S&P, or "AA" by Fitch.
3. All medium-term notes are limited to 15 percent of the combined pool on the date of purchase.
4. Any one issuer is limited to 4 percent of the combined pool.

K. MONEY MARKET MUTUAL FUNDS (Shares of Beneficial Interest), as defined and restricted by GC §53601(k).

OFFICE RESTRICTIONS: No more than 10 percent of the combined pool may

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be invested in any one mutual fund, and subject to limitations identified in the County Treasurer's written policies and procedures. The County Treasury shall invest in money market mutual funds only with the specific written approval of the County Treasurer.

- L. PLEDGED FUNDS** held by a trustee or fiscal agent and pledged to the payment or security of bonds or other indebtedness, or obligations under a lease, installment sale, or other agreement of a local agency, or certificate of participation in 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 a local agency providing for the issuance.
- M. NOTES, BONDS**, or other obligations that are at all times secured by a valid first priority security interest in securities of the types listed by GC §53651 as eligible securities for the purpose of securing local agency deposits having a market value at least equal to that required by GC §53652 for the purpose of securing local agency deposits. The securities serving as collateral shall be placed by delivery or book entry into the custody of a trust company or the trust department of a bank that is not affiliated with the issuer of the secured obligation, and the security interest shall be perfected in accordance with the requirements of the Uniform Commercial Code or federal regulations applicable to the types of securities in which the security interest is granted.

OFFICE RESTRICTIONS: Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.

- N. 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 maximum of five years' maturity. 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~~ *NRSRO* and rated in a rating category of "AA" or its equivalent or better by a ~~nationally recognized rating service~~ *NRSRO*. Purchase of authorized securities may not exceed 20 percent of the agency's surplus money that may be invested.

OFFICE RESTRICTIONS:

1. Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.
2. The County Treasurer shall invest or direct the investment of these funds

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when directed to do so by the County Administrative Officer or the County Board of Supervisors.

O. LOCAL AGENCY INVESTMENT FUND (LAIF)

Investments are authorized in LAIF, subject to the limitations issued by LAIF.

OFFICE RESTRICTIONS: Non-bond funds and non-specific investments deposited with LAIF are limited to 20 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures.

XII. POLICY ISSUES

A. EXEMPTION

Any investment held at the date of this revision not meeting the guidelines of this policy shall be exempted from the requirements of revisions subsequent to their acquisition. At maturity or liquidation, any replacement investments shall be in compliance with the revised policy.

B. AMENDMENTS/REVISIONS

This *IP* revision shall remain in force until amended in writing by the County Treasurer.

1. *The County Treasurer shall annually present the IP to the CTOC and the County Board of Supervisors for their review and approval at a public meeting.*
2. Interim revisions or amendments to the *IP* shall be presented to the CTOC and the County Board of Supervisors for their review and approval at a public meeting.
3. The County Treasurer shall render the *IP* to the California Debt and Investment Advisory Commission (CDIAC) within 60 days following the end of the second quarter of each calendar year and 60 days after the subsequent amendments thereto.

C. CALCULATING AND APPORTIONING THE COSTS

The manner of calculating and apportioning the costs of investing, depositing, banking, auditing, reporting, or otherwise, handling or managing funds is as follows:

1. Total earnings for all funds will be accounted for and accumulated. All costs incurred as described in GC §27013, §27133, and §27135 will be accounted for and paid out of earnings.
2. Administrative costs will be distributed at 50 percent against earnings of non-specific investments, with the remaining 50 percent against earnings of all investments. Banking costs will be distributed at 80 percent against earnings of non-specific investments, with the remaining 20 percent against earnings of all investments.
3. Other methods of allocating cost will be utilized on an individual basis

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when deemed by the County Treasurer to be equitable to the combined pool and agreed upon by the pool participant.

D. CRITERIA FOR CONSIDERING REQUESTS TO WITHDRAW FOR INVESTMENT PURPOSES

The County Treasurer shall provide a form to agencies requesting withdrawal of funds for investment purposes. The County Treasurer expresses no opinion on the suitability of any investment contemplated in connection with withdrawals for investment purposes and requires a resolution approving the withdrawal from the agency's governing board. Assessment of the effect of a proposed withdrawal on the stability and predictability of the investments in the combined pool, shall be based on the following criteria:

1. Size of withdrawal
2. Size of remaining balances of:
 - a. Pool
 - b. Agency
3. Current market condition
4. ~~Duration of withdrawal~~
4. Effect on predicted cash flows
5. A determination if there will be sufficient balances remaining to cover costs
6. Adequate information has been supplied to the County Treasurer in order to make a proper finding that other pool participants will not be adversely affected.
7. When the County Treasurer finds that a withdrawal will adversely affect the other pool participants, the County Treasurer may approve the withdrawal if the County Treasurer and the requesting agency arrive at an agreement that will negate this impact to the pool participants.

E. TERMS AND CONDITIONS FOR NON-STATUTORY COMBINED POOL PARTICIPANTS

All entities qualifying under GC §27133(g), may deposit funds for investment purposes providing all of the following has been accomplished:

1. The agency's administrative body has requested the privilege, has agreed to terms and conditions of an investment agreement as prescribed by the County Treasurer, and has by resolution identified the authorized officer acting on behalf of the agency.
2. The County Board of Supervisors approves the investment agreement.
3. The County Auditor-Controller shall prescribe the appropriate accounting procedures.

~~XIII. DISASTER RECOVERY PLAN~~

~~Each member of the Investment Team is provided with three copies (home, car, office) of the Disaster Recovery Plan that includes the following information:~~

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A. CONTACTS

1. Key personnel telephone numbers.
2. Authorized banks and broker/dealers contact list including telephone, fax and addresses.

B. INVESTMENT INFORMATION

1. Current Investment Policy
2. Cash Management Plan Investment Restrictions
3. Banking/Investment Forms

~~At least two authorized members of the Investment Team will meet at a location to be communicated at the time if our office is uninhabitable. The goal will be to protect County funds and continue to meet funding requirements for all Treasury participant agencies.~~

XIII. DISASTER RECOVERY PLAN

A. GOAL

The goal of the Disaster Recovery Plan is to protect County funds and continue to meet funding requirements for all Treasury participant agencies in case an emergency disrupts normal operations.

B. EMERGENCY TREASURY PACKETS

Each member of the Investment Team is provided with three copies (home, car, office) of the Disaster Recovery Plan that includes the following information:

1. CONTACTS

- a. Key personnel telephone numbers.
- b. Authorized banks and broker/dealers contact list including telephone, fax and addresses.

2. INVESTMENT INFORMATION

- a. Current IP
- b. County Treasurer's written policies and procedures
- c. Banking/Investment Forms

C. PROCESSES

1. Normal processes may be modified to accommodate the emergency situation. However, the investment restrictions in this IP and the County Treasurer's written policies and procedures will be strictly followed.
2. Emergency conditions allowing, at least two authorized members of the Investment Team will meet at an agreed upon location.

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GLOSSARY OF TERMS

Some terms or words used in this document have specific meaning relative to this *IP*. The following are described as they pertain to this *IP*. Terms not defined in the Glossary are to be interpreted with their standard accepted definition.

ACCRUED INTEREST

The amount of interest that is earned but unpaid since the last interest payment date.

AGENCIES OR FEDERAL AGENCIES

See Government Sponsored Enterprises

BANK

An organization that offers customers specific financial services such as allowing deposits, loaning of money, and other investment opportunities.

BANKERS ACCEPTANCES

A time draft drawn on and accepted by a bank, the customary means of effecting payment for merchandise sold in import-export transactions and a source of financing used extensively in international trade. With the credit strength of a bank behind it, the bankers acceptance usually qualifies as a money market instrument.

BOOK ENTRY

The system maintained by the Federal Reserve, by which most money market securities are delivered to an investor's custodian bank. The Federal Reserve maintains a computerized record of the ownership of these securities and records any changes in ownership corresponding to payments made over the Federal Reserve wire system. (~~delivery verses payment~~).

BROKER/DEALER

Any person engaged in the business of effecting transactions in securities in this state for the account of others or for his own account. "Broker-dealer" also includes a person engaged in the regular business of issuing or guaranteeing options with regard to securities not of his own issue.

CALIFORNIA DEBT AND INVESTMENT ADVISORY COMMISSION (CDIAC)

The CDIAC provides information, education, and technical assistance on public debt and investments to local public agencies and other public finance professionals. The Commission was created in 1981 with the passage of Chapter 1088, Statutes of 1981 (AB 1192, Costa), which established it as the State's clearinghouse for public debt issuance information and required it to assist state and local agencies with the monitoring, issuance, and management of public debt.

CALLABLE SECURITIES

A callable security is a bond, preferred stock or debenture which may be redeemed or "called"

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by the issuing company prior to its maturity. The company may have the right to redeem all or part of the debt. Usually done by the company when interest rates drop. The company wants to replace expensive debt with lower-interest-rate debt.

CERTIFICATE OF DEPOSIT (CD)

A deposit of funds at a bank for a specified period of time that earns interest at a specified rate. Commonly know as "CDs." Institutional CDs are usually issued in denomination of \$100,000 or more. Maturities range from a few weeks to several years. Interest rates are set by competitive forces in the market place. (See **NEGOTIABLE CERTIFICATES OF DEPOSIT**)

COLLATERAL

Assets pledged as security for applicable investments. Pledged securities must meet the requirements of California law.

COMBINED POOL

The County maintains a combined pool with cash and investments which provide cash flow for the funding needs of the participants. Participants include County departments, agencies, schools, and special districts. The combined pool is managed by the San Luis Obispo County Treasurer. The combined pool portfolio is carried at amortized cost and includes accrued interest.

COMMERCIAL PAPER

Short-term unsecured obligations with maturities ranging from 2 to 270 days issued by banks, corporations, and other borrowers to investors with temporarily idle cash. Such instruments are usually discounted, although some are interest-bearing. It is issued only by top-rated concerns and is nearly always backed by bank lines of credit. ~~Moody's, S&P, and Fitch assign ratings to commercial paper.~~ *Ratings are assigned by a nationally recognized rating service organization (NRSROs)*

CONFIRMATION

Formal memorandum from a broker/dealer to the County Treasury giving the details of a securities transaction, i.e., purchase or sale. The confirmation is compared to the investment tracking system by authorized staff not directly supervised by investment personnel.

~~Discrepancies, as defined in this glossary, are reported immediately to the County Treasurer or the Deputy County Treasurer. (See **DISCREPANCY**)~~

*Discrepancies shall be referred immediately to the Assistant Treasurer (provided that the Assistant Treasurer did not execute the transaction) or the County Treasurer. (See **DISCREPANCY**)*

COUNTY TREASURY OVERSIGHT COMMITTEE (CTOC)

The CTOC was established in 1996. The committee consists of five members appointed from seven categories, County Treasurer, County Auditor-Controller, representative appointed by the County Board of Supervisors, County Superintendent of Schools or designee, representative of San Luis Obispo County School Boards, representative of San Luis Obispo County Special Districts, or public member. The duties include the following: a) review and

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monitor the annual investment policy, b) contract for an annual investment policy compliance audit, c) present the annual investment compliance audit to the Board of Supervisors, d) elect a chairperson and vice chairperson, e) ensure compliance with all provisions of the Ralph M. Brown Act, f) meet 45 days after the end of the quarter covered by the quarterly report, g) review the County Treasurer's Quarterly Report.

CUSTODIAN/CUSTODY

The financial institution where the investments purchased by the County Treasury are held.

DELIVERY VS. PAYMENT (DVP)

Delivery of securities purchased by the County Treasury is made to the County Treasurer's custodian in exchange for payment.

DERIVATIVE

~~A contract whose value is based on the performance of an underlying financial asset, index or other investment.~~

DERIVATIVE

An investment whose characteristics and value are based on the performance of an underlying financial asset, index or other investment. Derivatives include inverse floaters, range notes, or mortgage-derived, interest-only strips and any security that could result in zero interest accrual if held to maturity.

DISCOUNT

The difference between the bond's current market price and its face or redemption value. (See **PREMIUM**)

DISCREPANCY

A difference or variance from what is expected or stated. Any of the following discrepancies found in the County Treasury investment confirmation process are referred immediately to the Assistant Treasurer (provided that the Assistant Treasurer did not execute the transaction) or the County Treasurer. (See **CONFIRMATION**)

- A. Description of a security
- B. Broker information
- C. Purchase or maturity date
- D. Full value of a security
- E. Purchase price
- F. Interest amount
- G. Confirmation not received within 10 business days

DIVERSIFICATION

The spreading of risk by investing in a variety of securities offering independent returns.

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FEDERAL AGRICULTURAL MORTGAGE CORPORATION (Farmer Mac)

Federal Agency established in 1988 to provide a secondary market for farm mortgage loans.

FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC)

A federal agency that insures bank deposits, currently up to \$100,000.00 per deposit.

FEDERAL NATIONAL MORTGAGE ASSOCIATION (FNMA or Fannie Mae)

A publicly owned federally chartered corporation established in 1938. It carries a congressional mandate to promote a secondary market for conventional, Federal Housing Administration, and Veterans Administration single and multi-family mortgages. It is a publicly held company whose stock trades on the New York Stock Exchange. Both discount notes and bonds are issued.

FEDERAL HOME LOAN MORTGAGE CORPORATION (FHLMC or Freddie Mac)

A stockholder owned corporation established by Congress in 1970 to provide a continuous flow of funds to mortgage lenders, through developing and maintaining an active nationwide secondary market in conventional residential mortgages. It is a publicly held corporation whose stock trades on the New York Stock Exchange. Both discount notes and bonds are issued.

FEDERAL HOME LOAN BANK (FHLB)

A system of 12 regional banks, created in 1932, which are owned by private member institutions and regulated by the Federal Housing Finance Board (FHFB). Functioning as a credit reserve system, they facilitate extension of credit through owner-members in order to provide access to housing and to improve the quality of communities. It raises money by issuing notes and bonds and lends money to savings and loan associations and other mortgage lenders based on the amount of collateral the institution can provide. Both discount notes and bonds are issued.

FEDERAL FARM CREDIT SYSTEM (Farm Cr)

Established by the Farm Credit Act of 1971, this nationwide system of banks and associations provides mortgage loans, credit and related services to farmers, rural homeowners, and agricultural and rural cooperatives. The banks and associations are cooperatively owned, directly or indirectly, by their respective borrowers. The network of 12 Farm Credit District Banks issue securities on a consolidated basis. Both discount notes and bonds are issued.

FEDERAL RESERVE SYSTEM

System established by the Federal Reserve Act of 1913 to regulate the U.S. monetary and banking system. It is comprised of 12 regional Federal Reserve Banks, their 24 branches and all national and state banks that are part of the system.

FITCH RATINGS (FITCH)

~~A nationally recognized statistical rating organization. The County Treasury uses Moody's, Standard and Poors, or Fitch Ratings as its primary rating sources in determining eligibility for securities purchases.~~

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FITCH RATINGS (FITCH)

*One of the NRSROs utilized by the County Treasurer in determining eligibility for securities purchases. (See **NATIONALLY RECOGNIZED RATING SERVICE ORGANIZATION**)*

~~GOVERNMENT SPONSORED ENTERPRISES (GSE)~~

~~A general term for several privately owned, publicly chartered agencies created to reduce borrowing costs for certain sectors of the economy such as farmers, homeowners and students. The GSEs that issue debt instruments as of the time of this printing include: Federal Home Loan Banks, Federal National Mortgage Association, Federal Home Loan Mortgage Corporation, Farm Credit System, Federal Agricultural Mortgage Corporation, and the Student Loan Marketing Association. Other GSEs that formerly issued debt include the Tennessee Valley Authority and the Government National Mortgage Association. These GSEs and other governmental agencies such as the Farmers Housing Administration and the Small Business Administration now obtain their financing from the Federal Financing Bank.~~

GOVERNMENT SPONSORED ENTERPRISES (GSE)

A general term for several privately owned, publicly chartered agencies created to reduce borrowing costs for certain sectors of the economy such as farmers, homeowners and students. The GSEs that issue debt instruments as of the time of this printing include: Federal Home Loan Banks, Federal National Mortgage Association, Federal Home Loan Mortgage Corporation, Federal Farm Credit System, Federal Agricultural Mortgage Corporation, and the Student Loan Marketing Association.

INFORMAL COMPETITIVE BID

A verbal or written bid submitted to the County Treasury by a broker/dealer for a specific issue at a specific price or yield.

INTEREST

The amount earned while owning a debt security, generally calculated as a percentage of the principal.

~~INVESTMENT TRACKING SYSTEM~~

~~During 2005, the **TREASURY INVESTMENT MANAGER (TIM) SYSTEM**, currently utilized for the management of investments in the combined pool, will be replaced by the new Enterprise Financial System, Treasury module.~~

INVESTMENT TRACKING SYSTEM

*The Treasury Investment Manager System is currently utilized for the management of investments in the combined pool. (See **TREASURY INVESTMENT MANAGER (TIM) SYSTEM**)*

ISSUER

~~The entity that has the authority to distribute a security or investment. In the case of mutual funds, external investment pools, and other pooled investments, issuer refers to the entity~~

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invested in, not the investment company manager or pool sponsor.

ISSUER

Legal entity that has the power to issue and distribute a security. Issuers include corporations, municipalities, foreign and domestic governments and their agencies, and investment trusts.

LIQUIDITY

The ability to meet cash requirements by structuring the portfolio so that maturities meet anticipated cash flow needs as well as unanticipated cash flow needs by including marketable securities in the portfolio.

LOCAL AGENCY

County, city, city and county, including a chartered city or county, school district, community college district, public district, county board of education, county superintendent of schools, or any public or municipal corporation.

MARKET VALUE

The price at which a security is trading and could presumably be purchased or sold.

~~MARKETABLE SECURITIES (LIQUID ASSETS)~~

~~A liquid asset is a security that can be converted easily and rapidly into cash without a substantial loss of value.~~

MARKETABLE SECURITIES

Marketable securities are securities that are easily sold. They are assets that can be readily converted into cash – for example, Treasuries, Agencies, Bankers Acceptances, and Commercial Paper.

MATURITY/MATURITY DATE

The date on which the principal amount of a security becomes due and payable.

~~MOODY'S INVESTORS SERVICE, INC. (MOODY'S)~~

~~A nationally recognized statistical rating organization. The County Treasury uses Moody's, Standard and Poors, or Fitch Ratings as its primary rating sources in determining eligibility for securities purchases.~~

MOODY'S INVESTORS SERVICE, INC. (MOODY'S)

*One of the NRSROs utilized by the County Treasurer in determining eligibility for securities purchases. (See **NATIONALLY RECOGNIZED RATING SERVICE ORGANIZATION**)*

MONEY MARKET MUTUAL FUNDS

Open ended mutual funds that invest in commercial paper, bankers acceptances, repurchase agreements, government securities, certificates of deposit, and other highly liquid and safe securities, and pay money market interest rates. The Net Asset Value (NAV) of these funds is

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managed to maintain at \$1.00.

~~NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION (NRSRO)~~

~~Rating agencies whose credit ratings are used under the Security and Exchange Commission's regulations. There are currently four NRSROs: Dominion Bond Rating Service Ltd., Fitch Ratings, Inc., Moody's Investors Service and the Standard and Poor's Division of the McGraw Hill Companies Inc.~~

NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION (NRSRO)

Rating agencies whose credit ratings are used under the Security and Exchange Commission's regulations. There are currently five officially designated NRSROs: Moody's, Standard & Poor's (S&P), Fitch, Dominion Bond Rating Services, and A.M. Best.

~~NEGOTIABLE CERTIFICATE OF DEPOSIT (NCD)~~

~~A large-dollar amount short-term certificate of deposit. Such certificates are issued by large banks and bought mainly by corporations and institutional investors. They are payable either to the bearer or to the order of the depositor, and, being negotiable, they enjoy an active secondary market, where they trade in round lots of \$5 million. Although they can be issued in any denomination from \$100,000 up, the typical amount is \$1 million. They have a minimum original maturity of 14 days; most original maturities are under six months.~~

NEGOTIABLE CERTIFICATE OF DEPOSIT

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*(See **CERTIFICATE OF DEPOSIT**)*

NONCALLABLE

Bond that is exempt from any kind of redemption for a stated time period.

PORTFOLIO

A group of securities held by an investor.

PREMIUM

Amount by which a bond sells above its face value. (See **DISCOUNT**)

PRIMARY DEALER

A group of government securities dealers that submit daily reports of market activity and positions and monthly financial statements to the Federal Reserve Bank of New York and are subject to its informal oversight. Primary dealers include Securities and Exchange Commission (SEC) registered securities broker-dealers and banks.

PRINCIPAL

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The face value or par value of an investment.

RATING

~~Evaluation of financial institutions' investment and credit risks by professional institutional rating services. The County Treasury utilizes the ratings designations of Moody's, S&P and Fitch Ratings.~~

RECEIVABLE-BACKED SECURITIES

Securities collateralized with consumer receivables, which are owned by the issuer, but placed with a trustee for the benefit of the investor.

RECEIVABLE PASS-THROUGH CERTIFICATE

A debt obligation that is backed by a portfolio of receivables, normally issued by a bank or financial institution.

REGISTERED STATE WARRANT

A short-term obligation of a state governmental body issued in anticipation of revenue.

~~**REPURCHASE AGREEMENT/TRI-PARTY, BI-PARTY**~~

~~Agreement between a seller and a buyer, usually of government securities, whereby the seller agrees to repurchase the securities at an agreed upon price at a stated time. The County Treasury is involved with TRI-PARTY repurchase agreements where the purchased securities are in safekeeping with a custodian other than the seller, and BI-PARTY repurchase agreements, where the purchased securities are in safekeeping with the seller.~~

REPURCHASE AGREEMENT/TRI-PARTY, BI-PARTY

An agreement between a seller and a buyer, usually of government securities, whereby the seller agrees to repurchase the securities at an agreed upon price at a stated time. A TRI-PARTY repurchase agreement is where the purchased securities are in safekeeping with a custodian other than the seller or the buyer. A BI-PARTY repurchase agreement is where the purchased securities are in safekeeping with the seller.

RULE G-37 OF THE MUNICIPAL SECURITIES RULEMAKING BOARD

Federal regulations to sever any connection between the making of political contributions and the awarding of municipal securities.

SAFEKEEPING

Storage and protection of securities provided by an institution where control is designated by the County Treasury. (See **CUSTODIAN/CUSTODY**)

SECURITIES AND EXCHANGE COMMISSION (SEC)

Agency created by Congress to protect investors in securities transactions by administering securities acts. The statutes administered by the SEC are designed to promote full public disclosure and protect the investing public against malpractice in the securities market.

~~**STANDARD AND POOR'S CORPORATION (S&P)**~~

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~~A nationally recognized statistical rating organization. The County Treasury uses Moody's, Standard and Poors, or Fitch Ratings as its primary rating sources in determining eligibility for securities purchases.~~

STANDARD AND POOR'S CORPORATION (S&P)

*One of the NRSROs utilized by the County Treasurer in determining eligibility for securities purchases. (See **NATIONALLY RECOGNIZED RATING SERVICE ORGANIZATION**)*

STUDENT LOAN MARKETING ASSOCIATION (SLMA OR SALLIE MAE)

A government sponsored entity created by the Higher Education Act of 1965 to provide liquidity for private lenders (banks, savings and loan associations, educational institutions, state agencies, and other lenders). It participates in the Federal Guaranteed Student Loan Program, supplemental loan programs, the Health Education Assistance Loan Program, and/or the PLUS loan program for parents of undergraduates. It is owned by its stockholders and its shares trade on the New York Stock Exchange. Both discount notes and bonds are issued.

TREASURER'S DAILY REPORT (TDR)

A report prepared daily by the County Treasury cashier summarizing the day's receipts and disbursements, investment activity, and cash. Month-to-date totals are also reported for receipts and disbursements. The TDR is submitted daily to the County Auditor-Controller. At month-end the TDR is submitted to the County Board of Supervisors, County Administrative Officer, and County Auditor-Controller.

TREASURY INVESTMENT MANAGER (TIM) SYSTEM

Database system used for the management of investments in the combined pool. Reports include the schedule of investments, specific percentage reports by type of instrument and broker, weighted average yield and life of the portfolio, purchase and maturities, quarterly interest accrual, and tracking of the carrying value of each instrument. TIM's reporting is audited quarterly by the County Auditor-Controller. (See **INVESTMENT TRACKING SYSTEM**)

~~**TREASURY BILLS**~~

~~Short term obligations of the United States Government, usually sold at a discount. Each week the U.S. Treasury issues a 4-Week Bill, a 13-Week Bill, and a 26-Week Bill.~~

TREASURY BILLS

Short-term obligations of the United States Government, usually sold at a discount. The U.S. Treasury issues range from a few days to 26 weeks.

TREASURY BONDS

Long term obligations of the United States Government. They are sold by cash subscription, in exchange for outstanding or maturing government issues. Maturities are ten years or longer.

TREASURY NOTES

Intermediate term obligations of the United States Government. They are sold by cash subscription, in exchange for outstanding or maturing government issues, or at auctions.

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Maturities range from one to ten years.

YIELD

Return on an investment. The County Treasury uses the following formula for calculating yield on securities held in the combined pool:

Earnings ÷ amount invested ÷ life of investment in days x 365 days

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San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

Any comments or suggestions regarding this Investment Policy may be directed to:

- County Treasurer's Office
Attention: Designated Investment Officer
P.O. Box 1149
San Luis Obispo, CA 93406
- Telephone Number:
(805) 781-5842
- Fax Number:
(805) 781-1079
- E-mail Address:
ttc@co.slo.ca.us
- Website:
www.slocountytax.org

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San Luis Obispo County Treasury



Calendar Year 2006

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San Luis Obispo County Treasurer

1055 Monterey Street
Room D-290, County Government Center
San Luis Obispo, CA 93408
Telephone Number: (805) 781-5842
Fax Number: (805) 781-1079
Email: ttc@co.slo.ca.us
Website: slocountytax.org

Approval Schedule

- County Treasury Oversight Committee (CTOC)
November 9, 2005, Meeting
- County Board of Supervisors
January 10, 2006, Meeting

Approved policy will remain in effect until succeeding policy is adopted.



INVESTMENT POLICY

- Established: May 1983
- Current Revision: January 2006

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2006 INVESTMENT POLICY

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2006 INVESTMENT POLICY

I. POLICY STATEMENT

The San Luis Obispo County Treasurer shall prudently manage County funds and funds of local agencies in the combined pool pursuant to the defined objectives which, in the order of priority, are safety, liquidity, and yield, while in compliance with laws and policies.

The purpose of this written Investment Policy (*IP*) is to clearly state the guidelines and standards established by the San Luis Obispo County Treasurer for the prudent investment of the combined pool, define the objectives of managing the combined pool, and maintain internal controls and reporting requirements.

The funds are managed with a high degree of care and prudence. Though all investments contain a degree of "risk," the proper exercise of prudence, the maintenance of a high level of ethical standards, and the proper delegation of authority reduces the potential for any realized loss.

This *IP* establishes the standards under which the County Treasurer shall conduct business with financial institutions with regard to the investment process. These standards establish the basis for the investment program.

II. SCOPE

This policy is intended to cover all investment activities under the direct authority of the County Treasurer. The County maintains a combined pool with cash and investments which provide cash flow for the funding needs of the participants. Participants include County departments, agencies, schools, and special districts. A list of all participants is maintained by fund through the County Auditor-Controller's enterprise financial system. Normal banking processes, standards, and relationships are defined by the California Government Code (GC) and are not a part of the *IP*.

III. OBJECTIVES

The primary objectives **in order of priority** are safety, liquidity, and yield, while maintaining compliance with federal, state, and local laws and regulations.

A. SAFETY

The combined pool shall be managed in a manner that ensures the preservation of capital. The objective is to minimize credit risk and interest rate risk.

1. Credit Risk

Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations.

a. Custodial Credit Risk

Custodial credit risk for investments is the risk that in the event of the failure of the counterparty to a transaction, a government will not be able to recover the value of investment or collateral securities that are in the possession of an outside party.

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2006 INVESTMENT POLICY

(III. OBJECTIVES – Continued)

This type of credit risk can be minimized by:

- (1) Pre-qualifying custody financial institutions.
- (2) Requiring custodian to hold securities in the County Treasurer's name.
- (3) Holding applicable securities in the County Treasurer's vault.

b. Concentration of Credit Risk

Concentration of credit risk is the risk of loss attributed to the magnitude of a government's investment in a single issuer.

This type of credit risk can be minimized by:

- (1) Limiting investments to the safest types of securities.
- (2) Diversifying the portfolio.

2. Interest Rate Risk

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. Interest rate risk may be minimized by structuring the portfolio so that securities mature to meet cash flow requirements for ongoing operations, and thereby avoiding the need to sell securities on the open market prior to maturity.

B. LIQUIDITY

The combined pool shall remain sufficiently liquid to meet all operating requirements. This will be accomplished by structuring the portfolio so that maturities meet cash flow requirements. The combined pool shall include marketable securities to assist in meeting unanticipated cash requirements.

C. YIELD

Each purchase made shall be subject to meeting the requirements of safety, liquidity, and competitive pricing.

D. COMPLIANCE

This *IP* is written to be in compliance with federal, state, and local laws and regulations. The combined pool is managed in compliance with this policy and applicable law. Whenever laws change, any affected section in this policy shall automatically change in application to conform to law.

IV. STANDARDS OF CARE

A. PRUDENCE

The County Treasury shall manage the combined pool pursuant to the "Prudent Investor Standard" (GC §27000.3(c)):

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2006 INVESTMENT POLICY

(IV. STANDARDS OF CARE – Continued)

When investing, reinvesting, purchasing, acquiring, exchanging, selling, or managing public funds, the county treasurer or the board of supervisors, as applicable, shall act with care, skill, prudence, and diligence under the circumstances then prevailing, specifically including, but not limited to, the general economic conditions and the anticipated needs of the county and other depositors, 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 county and the other depositors. Within the limitations of this section and considering individual investments as part of an overall investment strategy, investments may be acquired as authorized by law.

Investment personnel, while exercising due diligence and acting in compliance with federal, state, and local laws and regulations in accordance with the County Treasurer's written policies and procedures, and this *IP*, shall be relieved of personal responsibility for credit risks provided that deviations from expectations are reported in a timely manner. This could involve reporting a credit rating downgrade on an investment held by the Treasury. Often such credit downgrades foreshadow looming credit risks. Such information should be reported immediately to the County Treasurer and Assistant Treasurer.

B. DELEGATION OF AUTHORITY

California Government Code authorizes the County Treasurer to deposit, invest, and provide safekeeping for funds held in the County Treasury. The County Treasurer may delegate this authority to one or more deputy Treasurers, including the Assistant Treasurer, or other qualified management level employee; or to a qualified investment service organization.

No person may engage in an investment transaction except when delegated to do so by the County Treasurer and only as provided under the terms of this policy and the procedures established and approved by the County Treasurer. A list of authorized County investment personnel is maintained with authorized financial dealers and institutions. The County Treasurer shall maintain a system of internal controls to regulate the activities of investment personnel.

C. ETHICS AND CONFLICTS OF INTEREST

Individuals performing the investment function and members of the County Treasury Oversight Committee (CTOC) shall maintain the highest standards of conduct. Each person performing the investment function and members of the CTOC must maintain their independence and not have actual conflicts of interest. In addition, they shall avoid the appearance of having conflicts of interest or having lack of independence. Therefore, County Treasury investment personnel and members of the CTOC are subject to the following prohibitions and

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2006 INVESTMENT POLICY

(IV. STANDARDS OF CARE – Continued)

disclosures:

1. Prohibitions

- a. 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 affect their ability to make impartial decisions.
- b. Officers and employees shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the County.
- c. Investment personnel shall not accept gifts or gratuities from any bank, broker, dealer, or any other person, firm, or organization with which the County conducts business. Exceptions may be made for minor items of advertising and other items of minimal value with the approval of the County Treasurer.

2. Disclosures

Investment personnel shall disclose any material interest in financial institutions with which they conduct County business. They shall further disclose any personal financial/investment positions that could create the appearance of lack of independence.

Nothing in this *IP* supersedes any County ordinance or State law which regulates conduct. This policy may set standards higher than those established by ordinances or other laws.

V. AUTHORIZED FINANCIAL DEALERS AND INSTITUTIONS

A. SELECTION STANDARDS

The County Treasurer, in selecting financial institutions for the investment of funds, shall consider and monitor the credit worthiness of each institution. The County Treasurer shall approve each institution maintained on the authorized list which he determines is in the best interest of the County. In addition, organizations selected for the list must meet the following criteria:

1. Listed as a "Primary Dealer" by the Federal Reserve Bank of New York, or
2. A Nationally or State Chartered Bank with assets over five billion dollars (\$5,000,000,000), and has received an overall rating of not less than "satisfactory" in its most recent evaluation by the appropriate federal financial supervisory agency of its record of meeting the credit needs of California's communities, including low and moderate income neighborhoods, pursuant to governmental regulations, or
3. Issuer of commercial paper whose commercial paper meets the requirements established in the California Government Code.

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2006 INVESTMENT POLICY

(V. AUTHORIZED FINANCIAL DEALERS AND INSTITUTIONS – Continued)

B. CRITERIA FOR SELECTING SECURITY BROKERS AND DEALERS

1. The criteria shall prohibit the selection of any broker, brokerage, dealer, or securities firm that has, within any consecutive 48-month period following January 1, 1996, made a political contribution in an amount exceeding the limitations contained in Rule G-37 of the Municipal Securities Rulemaking Board, to the County Treasurer, any member of the governing board of the County or depositing local agency, or any candidate for those offices.
2. All financial institutions and broker/dealers who desire to become qualified bidders for investment transactions must meet the following conditions as appropriate:
 - a. Complete all investment transactions in a timely manner.
 - b. Maintain the normal and accepted industry standards for doing business.
 - c. Meet or exceed the minimum SELECTION STANDARDS identified under this policy.
 - d. Agree not to provide any honoraria, gift, or gratuity to any San Luis Obispo County investment personnel or to any member of the CTOC. Exceptions may be made for minor items of advertising and other items of minimal value with the approval of the County Treasurer.
 - e. Agree to comply with this *IP* (except for requirements related to Average Maturities, Category Limits, or Issuer Limits which may change daily).

C. AUTHORIZED BROKER/DEALER CONTACT LIST REVIEW

The County Treasurer, or the designee, shall periodically review the authorized list. The County Treasurer shall continue to maintain the financial institutions on the authorized broker/dealer contact list which he determines is in the best interest of the County.

VI. CUSTODIAL SERVICES

Custodial services shall be maintained at the following standards:

A. THIRD PARTY

Securities purchased from any bank or dealer, including appropriate collateral (as defined by State law) shall be placed with an independent third party for custodial safekeeping. The third party custodian is selected based on rating, experience, and service.

B. ACCOUNTING

Monthly safekeeping statements are received from banks where securities are held. Authorized staff, not directly supervised by investment personnel, shall compare the safekeeping statements with the statements generated by the investment tracking system utilized by the County Treasurer.

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2006 INVESTMENT POLICY

(VI. CUSTODIAL SERVICES – Continued)

C. VAULT SAFEKEEPING

Collateralized certificates of deposits shall be safe kept in the County Treasurer's vault.

D. TRANSACTIONS FOR INVESTMENTS

1. A list of individuals and their signatures, who are authorized to handle investment transactions and wire transfers, shall be provided to the safekeeping institution and the depository bank.
2. Trade instructions to the safekeeping institution shall be made for all investment purchases or sale transactions, either by electronic transmission or facsimile.

E. DELIVERY VS. PAYMENT

All trades, where applicable, shall be executed by delivery vs. payment (DVP). This ensures that securities are deposited in the eligible financial institution prior to the release of funds.

VII. INTERNAL CONTROLS

A. INTERNAL CONTROL STRUCTURE

An internal control structure shall be established and maintained that is appropriate for the circumstances. The internal controls shall be designed to provide reasonable assurances that the combined pool assets are protected.

B. INTERNAL CONTROL STANDARD

The concept of reasonable assurance recognizes that the cost of control should not exceed the benefits likely to be derived.

C. INTERNAL CONTROL REVIEW

Reviews of the internal controls shall be made to ensure:

1. Separation of transaction authority from accounting and record keeping.
2. Daily investment activity and preparation of investment tickets and trade instructions to custody shall be handled by designated investment personnel.
3. Broker investment confirmations shall be reviewed and compared to the investment tracking system by designated staff not directly supervised by investment personnel. Discrepancies shall be referred immediately to the Assistant Treasurer (provided that the Assistant Treasurer did not execute the transaction) or the County Treasurer.

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2006 INVESTMENT POLICY

VIII. EXTERNAL REVIEW

A. QUARTERLY REVIEW

1. The CTOC meets within 45 days after the end of each quarter to review the County Treasurer's Quarterly Report for consistency and compliance with the *IP*.
2. Quarterly, the County Auditor-Controller performs a cash audit of the County Treasury. This audit verifies the financial status and confirms compliance with federal, state, local laws and regulations, and the *IP*.

B. ANNUAL REVIEW

1. The CTOC is required to review and monitor the *IP*. To ensure compliance, the CTOC shall cause an annual *IP* compliance audit by contracting the services of the County Auditor-Controller, the County's contracted auditors, an independent certified public accountant separately contracted by the CTOC, or any combination thereof. Results of this audit shall be presented to the County Board of Supervisors.
2. To ensure compliance with the law and County policies and procedures, the County Auditor-Controller annually audits the County, including the office of County Treasurer.
3. Independent certified public accountants selected by the Board of Supervisors and the Grand Jury perform an annual audit of the books of accounts, financial records, and transactions of all offices of the County.
4. The *IP* is presented annually to the County Board of Supervisors for their review and approval at a public meeting.

IX. RESTRICTIONS APPLICABLE TO ALL INVESTMENTS

The following restrictions apply to all investments purchased on behalf of the County Treasurer:

A. INVESTMENT ORIGATION

Investment transactions shall originate at the office of the County Treasurer. Investment transactions originating at a location other than the office of County Treasurer must have the specific written approval of the County Treasurer.

B. AUTHORIZED PERSONNEL

All investment transactions shall only be made by personnel authorized by the County Treasurer.

C. COMPETITIVE PROCESS

All investment transactions shall be made on an informal competitive bid basis, unless impractical. The County Treasurer shall be notified when noncompetitive purchases are necessary.

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2006 INVESTMENT POLICY

(IX. RESTRICTIONS APPLICABLE TO ALL INVESTMENTS – Continued)

D. HOLDING TO MATURITY

Investments are to be purchased with the intent of holding the security to maturity. Trading of any security before maturity requires written authorization by the County Treasurer.

E. AUTHORIZATION

All investments purchased must be authorized by and are subject to the limitations of this *IP* and the County Treasurer's written policies and procedures. All purchases must be completed through financial institutions authorized by the County Treasurer.

F. MAXIMUM MATURITY

All investments, unless otherwise restricted, shall not exceed a maturity of five years without written approval of the County Treasurer, and only when in compliance with California law.

G. APPROVED SECURITIES

The County Treasurer shall maintain a method of internal control to ensure that appropriate investments are purchased.

H. PERCENTAGE LIMITATIONS

Where a percentage limitation is specified for a particular category of investment, that percentage is applicable only at the date of purchase.

I. HOLIDAYS AND OTHER NON-WORK DAYS

When any maturity has a maximum time limit and that date falls on a week-end or bank holiday, the number of days calculated shall be based on counting all the days to the first working day past the maturity date.

J. COLLATERALIZATION

Collateral taken on investments shall be priced at market value and must equal or exceed the amount required by law. Full collateralization is required on repurchase agreements and collateralized certificates of deposit. The collateral requirement, with respect to collateralized certificates of deposit that are covered under the FDIC program, are exempt to the amount covered.

K. DERIVATIVES

Derivatives which include inverse floaters, range notes, or mortgage-derived, interest-only strips and any security that could result in zero interest accrual if held to maturity are **prohibited**.

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2006 INVESTMENT POLICY

(IX. RESTRICTIONS APPLICABLE TO ALL INVESTMENTS – Continued)

L. FORM OF CURRENCY

All investments will be U.S. dollar denominated.

M. CALLABLE SECURITIES

Callable securities are redeemable by the issuer before the scheduled maturity. Callable investments are only allowable with the specific written approval of the County Treasurer for each investment.

X. GENERAL INVESTMENT PARAMETERS

A. DIVERSIFICATION

Investments shall be diversified by security type and institution to avoid losses that may be associated with either.

B. MATURITIES

After determination that anticipated cash flow requirements are funded, maturities will be scheduled in line with the current investment strategy.

C. REPORTING

1. A summary of all new investment transactions shall be recorded on the Treasurer's Daily Report (TDR), a copy of which is filed daily with the County Auditor-Controller.
2. Quarterly reports shall be produced and distributed in accordance with California law and by resolutions of the County Board of Supervisors. The report shall be distributed as follows:
 - a. The County Treasurer shall render a Quarterly Report to the County Administrative Officer, County Auditor-Controller, and the County Board of Supervisors within 30 days following the end of the quarter covered by the report.
 - b. The County Treasurer shall provide the CTOC with the Quarterly Report prior to their scheduled quarterly meeting covered by that report.
 - c. The County Treasurer may include the Quarterly Report on the Board of Supervisors agenda within 60 days following the end of the quarter covered by the report.
 - d. The County Treasurer shall provide pool participants that report to a separate board, i.e., school districts and special districts, a Quarterly Report of Combined Pool Investments within 20 days following the end of the quarter covered by the report.
 - e. The County Treasurer shall render to the California Debt and Investment Advisory Commission (CDIAC) the Quarterly Report of the second and fourth quarters of each calendar year within 60 days following the end of the quarter covered by the report.

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(X. GENERAL INVESTMENT PARAMETERS – Continued)

3. An annual report of Cash and Investments with deposit and investment risk disclosures is prepared for the County Auditor-Controller's Comprehensive Annual Financial Report which is audited by independent certified public accountants.
4. Market value reporting shall be provided in accordance with California law. When reports issued include market values of securities held, the source of those values shall be from the custodian bank; or estimates of values received from broker/dealers; or listings in the Wall Street Journal (WSJ); or internal calculations based on the current market rate for a specific treasury instrument as identified in the County Treasurer's written policies and procedures, and adjusted for estimated spreads to that instrument; or any combination of the above.

D. PERFORMANCE STANDARDS

The combined pool shall be managed in accordance with all applicable laws and with the standards established under this *IP* and the County Treasurer's written policies and procedures. The County Treasurer shall take appropriate steps to monitor the investment program.

E. PROCEEDS FROM THE ISSUANCE OF DEBT

Proceeds shall be invested according to the limitations of California law and appropriate issuing documents.

F. SPECIFIC INVESTMENTS

Specific investments requested by participant depositors may be made on behalf of the participant depositor, subject to the terms and conditions agreed upon by the County Treasurer and the participant depositor.

XI. AUTHORIZED INVESTMENTS – RESTRICTIONS AND/OR CONDITIONS

All investments must be made subject to California and Federal law. It is the intent of this *IP* to further restrict allowable investments for the combined pool to reduce exposure to investment risks. The following investments are authorized by California law and may be permitted by this *IP*, subject to the listed restrictions:

- A. BONDS ISSUED BY THE LOCAL AGENCY**, 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.

OFFICE RESTRICTIONS: Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.

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(XI. AUTHORIZED INVESTMENTS – Continued)

B. 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. The following instruments are permitted with the indicated restrictions:

1. TREASURY NOTES

OFFICE RESTRICTIONS: Maximum term five years and limited to 50 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures.

2. TREASURY BONDS

OFFICE RESTRICTIONS: Maximum term five years and limited to 50 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures.

3. TREASURY BILLS

OFFICE RESTRICTIONS: No percentage limit, but subject to limitations identified in the County Treasurer's written policies and procedures.

C. REGISTERED STATE WARRANTS, or treasury notes, or bonds of this state, including bonds payable solely out of the revenues from a revenue-producing property owned, controlled, or operated by the state or by a department, board, agency, or authority of the state.

OFFICE RESTRICTIONS: Maximum term one year and limited to 10 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer.

D. BONDS, NOTES, WARRANTS, or other evidences of indebtedness of any local agency within this state, 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.

OFFICE RESTRICTIONS: Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.

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2006 INVESTMENT POLICY

(XI. AUTHORIZED INVESTMENTS – Continued)

- E. FEDERAL AGENCY OR UNITED STATES GOVERNMENT-SPONSORED ENTERPRISE (GSE) OBLIGATIONS**, participations, or other instruments, including those issued by or fully guaranteed as to principal and interest by federal agencies or United States government-sponsored enterprises.

OFFICE RESTRICTIONS: Maximum term five years and limited to 25 percent of the combined pool per GSE, and subject to limitations identified in the County Treasurer's written policies and procedures.

- F. BANKERS ACCEPTANCES** otherwise known as bills of exchange or time drafts drawn on and accepted by a commercial bank. The purchase of bankers acceptances is restricted by State law as follows:
Purchase of bankers acceptances may not exceed 180 days' maturity or 40 percent of the combined pool. No more than 30 percent of the combined pool may be invested in the bankers acceptances of any one commercial bank.

OFFICE RESTRICTIONS: BANKERS ACCEPTANCES – DOMESTIC

1. To be eligible for purchase, a domestic issuer of bankers acceptances must have the highest short-term credit rating of a nationally recognized statistical rating organization (NRSRO), or must have specific written approval of the County Treasurer.
2. Domestic bankers acceptances may exceed 30 percent of the combined pool on the date of purchase, only with specific written approval of the County Treasurer.
3. More than 10 percent of the combined pool may be invested in domestic bankers acceptances of any one issuer, only with specific written approval of the County Treasurer.
4. Subject to further limitations as identified in the County Treasurer's written policies and procedures.

OFFICE RESTRICTIONS: BANKERS ACCEPTANCES – FOREIGN

1. To be eligible for purchase, a foreign issuer of bankers acceptances must have the highest short-term credit rating of a NRSRO, or must have specific written approval of the County Treasurer.
2. Foreign bankers acceptances may exceed 10 percent of the combined pool on the date of purchase, only with specific written approval of the County Treasurer.
3. More than 4 percent of the combined pool may be invested in foreign bankers acceptances of any one issuer, only with specific written approval of the County Treasurer.
4. Foreign bankers acceptances may exceed 90 days to maturity, only with specific written approval of the County Treasurer.
5. Subject to further limitations as identified in the County Treasurer's written policies and procedures.

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(XI. AUTHORIZED INVESTMENTS – Continued)

G. COMMERCIAL PAPER of “prime” quality of the highest ranking or of the highest letter and number rating as provided for by a NRSRO. The entity that issues the commercial paper shall meet all of the following conditions in either paragraph (1) or paragraph (2):

1. The entity meets the following criteria:
 - a. Is organized and operating in the United States as a general corporation.
 - b. Has total assets in excess of five hundred million dollars (\$500,000,000).
 - c. Has debt other than commercial paper, if any, that is rated “A” or higher by a NRSRO.
2. The entity meets the following criteria:
 - a. Is organized within the United States as a special purpose corporation, trust, or limited liability company.
 - b. Has program-wide credit enhancements including, but not limited to, overcollateralization, letters of credit, or surety bond.
 - c. Has commercial paper that is rated “A-1” or higher, or the equivalent, by a NRSRO.

Eligible commercial paper shall have a maximum maturity of 270 days or less. No more than 40 percent of the combined pool money may be invested in eligible commercial paper. No more than 10 percent of the combined pool money may be invested in the outstanding commercial paper of any single issuer. No more than 10 percent of the outstanding commercial paper of any single issuer may be purchased by the combined pool.

OFFICE RESTRICTIONS:

1. Commercial paper may exceed 15 percent of the combined pool on the date of purchase, only with specific written approval of the County Treasurer.
2. More than 5 percent of the combined pool may be invested in commercial paper of any one issuer, only with specific written approval of the County Treasurer.
3. Commercial paper may exceed 90 days to maturity, only with the specific written approval of the County Treasurer.
4. Subject to further limitations as identified in the County Treasurer’s written policies and procedures.

H. CERTIFICATES OF DEPOSIT (CD’s)

1. **COLLATERALIZED CERTIFICATES OF DEPOSIT (CD’s)** issued by banks, have limited liquidity. Collateralized CD’s may be redeemed early, but are then subject to early withdrawal penalties. Banks must maintain collateral in compliance with California law.

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(XI. AUTHORIZED INVESTMENTS – Continued)

OFFICE RESTRICTIONS:

- a. The County Treasurer shall maintain a contract with each bank where these deposits are held.
- b. Collateralized CD's may exceed one year to maturity only with the specific written approval of the County Treasurer.
- c. Collateralized CD's are limited to 20 percent of the combined pool.
- d. Any one issuer is limited to 5 percent of the combined pool.
- e. Must have specific written approval of the County Treasurer for each investment.

2. **NEGOTIABLE CERTIFICATES OF DEPOSIT** issued by a nationally or state-chartered bank, a savings association or a federal association, a state or federal credit union (additional restrictions in GC §53601 (h)) or by a state-licensed branch of a foreign bank. Purchases of negotiable certificates of deposit may not exceed 30 percent of the agency's surplus money which may be invested pursuant to this *IP*.

OFFICE RESTRICTIONS: Maximum term 90 days and limited to 20 percent of the combined pool, and subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.

I. **REPURCHASE AGREEMENTS, REVERSE REPURCHASE AGREEMENTS, AND SECURITIES LENDING AGREEMENTS**

1. **REPURCHASE AGREEMENTS** may be made on any investment authorized in GC §53601, when the term of the agreement does not exceed one year. The market value of securities that underlay a repurchase agreement shall be valued at 102 percent or greater of the funds borrowed against those securities and the value shall be adjusted no less than quarterly. Since the market value of the underlying securities is subject to daily market fluctuations, the investments in repurchase agreements shall be in compliance if the value of the underlying securities is brought back up to 102 percent no later than the next business day.

OFFICE RESTRICTIONS:

- a. Agreements:
 - (1) A tri-party repurchase agreement between the County Treasurer, the seller, and the custodian must be on file in the County Treasurer's office before conducting repurchase transactions covered by the agreement; or
 - (2) A bi-party repurchase agreement between the County Treasurer and the seller may be implemented only with the specific written approval of the County Treasurer and must

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(XI. AUTHORIZED INVESTMENTS – Continued)

be on file in the County Treasurer's office before conducting repurchase transactions covered by the agreement.

- b. Must be on the County Treasurer's list of approved repurchase agreement issuers.
- c. Repurchase agreements may exceed 30 days to maturity only with the specific written approval of the County Treasurer.
- d. Limited to 15 percent of the combined pool.
- e. Subject to limitations identified in the County Treasurer's written policies and procedures.

2. **REVERSE REPURCHASE AGREEMENTS** are identified in GC §53601 (i).

OFFICE RESTRICTIONS: Reverse repurchase agreements are not authorized by the County Treasurer.

3. **SECURITIES LENDING AGREEMENTS** are identified in GC §53601 (i).

OFFICE RESTRICTIONS: Securities lending agreements are not authorized by the County Treasurer.

J. **MEDIUM-TERM NOTES**, defined as all corporate and depository institution debt securities with a maximum remaining maturity of five years or less, 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 "A" or better by a NRSRO. Purchases of medium-term notes shall not include other instruments authorized and may not exceed 30 percent of the agency's money that may be invested pursuant to this *IP*.

OFFICE RESTRICTIONS: Maximum term four years, subject to limitations identified in the County Treasurer's written policies and procedures. In addition the following restrictions also apply:

1. Must be issued at a fixed rate and must be non-callable.
2. Maturities over one year must have a minimum rating of "Aa2" by Moody's, "AA" by S&P, or "AA" by Fitch.
3. All medium-term notes are limited to 15 percent of the combined pool on the date of purchase.
4. Any one issuer is limited to 4 percent of the combined pool.

K. **MONEY MARKET MUTUAL FUNDS (Shares of Beneficial Interest)**, as defined and restricted by GC §53601(k).

OFFICE RESTRICTIONS: No more than 10 percent of the combined pool may be invested in any one mutual fund, and subject to limitations identified in the

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(XI. AUTHORIZED INVESTMENTS – Continued)

County Treasurer's written policies and procedures. The County Treasury shall invest in money market mutual funds only with the specific written approval of the County Treasurer.

L. **PLEGGED FUNDS** held by a trustee or fiscal agent and pledged to the payment or security of bonds or other indebtedness, or obligations under a lease, installment sale, or other agreement of a local agency, or certificate of participation in 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 a local agency providing for the issuance.

M. **NOTES, BONDS**, or other obligations that are at all times secured by a valid first priority security interest in securities of the types listed by GC §53651 as eligible securities for the purpose of securing local agency deposits having a market value at least equal to that required by GC §53652 for the purpose of securing local agency deposits. The securities serving as collateral shall be placed by delivery or book entry into the custody of a trust company or the trust department of a bank that is not affiliated with the issuer of the secured obligation, and the security interest shall be perfected in accordance with the requirements of the Uniform Commercial Code or federal regulations applicable to the types of securities in which the security interest is granted.

OFFICE RESTRICTIONS: Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.

N. **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 maximum of five years' maturity. 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 NRSRO and rated in a rating category of "AA" or its equivalent or better by a NRSRO. Purchase of authorized securities may not exceed 20 percent of the agency's surplus money that may be invested.

OFFICE RESTRICTIONS:

1. Maximum term one year and limited to 5 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures. Must have specific written approval of the County Treasurer for each investment.
2. The County Treasurer shall invest or direct the investment of these funds

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- (XI. AUTHORIZED INVESTMENTS – Continued)
when directed to do so by the County Administrative Officer or the County Board of Supervisors.

O. LOCAL AGENCY INVESTMENT FUND (LAIF)

Investments are authorized in LAIF, subject to the limitations issued by LAIF.

OFFICE RESTRICTIONS: Non-bond funds and non-specific investments deposited with LAIF are limited to 20 percent of the combined pool, subject to limitations identified in the County Treasurer's written policies and procedures.

XII. POLICY ISSUES

A. EXEMPTION

Any investment held at the date of this revision not meeting the guidelines of this policy shall be exempted from the requirements of revisions subsequent to their acquisition. At maturity or liquidation, any replacement investments shall be in compliance with the revised policy.

B. AMENDMENTS/REVISIONS

This *IP* revision shall remain in force until amended in writing by the County Treasurer.

1. The County Treasurer shall annually present the *IP* to the CTOC and the County Board of Supervisors for their review and approval at a public meeting.
2. Interim revisions or amendments to the *IP* shall be presented to the CTOC and the County Board of Supervisors for their review and approval at a public meeting.
3. The County Treasurer shall render the *IP* to the California Debt and Investment Advisory Commission (CDIAC) within 60 days following the end of the second quarter of each calendar year and 60 days after the subsequent amendments thereto.

C. CALCULATING AND APPORTIONING THE COSTS

The manner of calculating and apportioning the costs of investing, depositing, banking, auditing, reporting, or otherwise, handling or managing funds is as follows:

1. Total earnings for all funds will be accounted for and accumulated. All costs incurred as described in GC §27013, §27133, and §27135 will be accounted for and paid out of earnings.
2. Administrative costs will be distributed at 50 percent against earnings of non-specific investments, with the remaining 50 percent against earnings of all investments. Banking costs will be distributed at 80 percent against earnings of non-specific investments, with the remaining 20 percent against earnings of all investments.

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(XII. POLICY ISSUES – Continued)

3. Other methods of allocating cost will be utilized on an individual basis when deemed by the County Treasurer to be equitable to the combined pool and agreed upon by the pool participant.

D. CRITERIA FOR CONSIDERING REQUESTS TO WITHDRAW FOR INVESTMENT PURPOSES

The County Treasurer shall provide a form to agencies requesting withdrawal of funds for investment purposes. The County Treasurer expresses no opinion on the suitability of any investment contemplated in connection with withdrawals for investment purposes and requires a resolution approving the withdrawal from the agency's governing board. Assessment of the effect of a proposed withdrawal on the stability and predictability of the investments in the combined pool, shall be based on the following criteria:

1. Size of withdrawal
2. Size of remaining balances of:
 - a. Pool
 - b. Agency
3. Current market condition
4. Effect on predicted cash flows
5. A determination if there will be sufficient balances remaining to cover costs
6. Adequate information has been supplied to the County Treasurer in order to make a proper finding that other pool participants will not be adversely affected.
7. When the County Treasurer finds that a withdrawal will adversely affect the other pool participants, the County Treasurer may approve the withdrawal if the County Treasurer and the requesting agency arrive at an agreement that will negate this impact to the pool participants.

E. TERMS AND CONDITIONS FOR NON-STATUTORY COMBINED POOL PARTICIPANTS

All entities qualifying under GC §27133(g), may deposit funds for investment purposes providing all of the following has been accomplished:

1. The agency's administrative body has requested the privilege, has agreed to terms and conditions of an investment agreement as prescribed by the County Treasurer, and has by resolution identified the authorized officer acting on behalf of the agency.
2. The County Board of Supervisors approves the investment agreement.
3. The County Auditor-Controller shall prescribe the appropriate accounting procedures.

2006 INVESTMENT POLICY

XIII. DISASTER RECOVERY PLAN

A. GOAL

The goal of the Disaster Recovery Plan is to protect County funds and continue to meet funding requirements for all Treasury participant agencies in case an emergency disrupts normal operations.

B. EMERGENCY TREASURY PACKETS

Each member of the Investment Team is provided with three copies (home, car, office) of the Disaster Recovery Plan that includes the following information:

1. CONTACTS

- a. Key personnel telephone numbers.
- b. Authorized banks and broker/dealers contact list including telephone, fax and addresses.

2. INVESTMENT INFORMATION

- a. Current IP
- b. County Treasurer's written policies and procedures
- c. Banking/Investment Forms

C. PROCESSES

- 1. Normal processes may be modified to accommodate the emergency situation. However, the investment restrictions in this IP and the County Treasurer's written policies and procedures will be strictly followed.
- 2. Emergency conditions allowing, at least two authorized members of the Investment Team will meet at an agreed upon location.

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2006 INVESTMENT POLICY

GLOSSARY OF TERMS

Some terms or words used in this document have specific meaning relative to this *IP*. The following are described as they pertain to this *IP*. Terms not defined in the Glossary are to be interpreted with their standard accepted definition.

ACCRUED INTEREST

The amount of interest that is earned but unpaid since the last interest payment date.

AGENCIES OR FEDERAL AGENCIES

See Government Sponsored Enterprises

BANK

An organization that offers customers specific financial services such as allowing deposits, loaning of money, and other investment opportunities.

BANKERS ACCEPTANCES

A time draft drawn on and accepted by a bank, the customary means of effecting payment for merchandise sold in import-export transactions and a source of financing used extensively in international trade. With the credit strength of a bank behind it, the bankers acceptance usually qualifies as a money market instrument.

BOOK ENTRY

The system maintained by the Federal Reserve, by which most money market securities are delivered to an investor's custodian bank. The Federal Reserve maintains a computerized record of the ownership of these securities and records any changes in ownership corresponding to payments made over the Federal Reserve wire system.

BROKER/DEALER

Any person engaged in the business of effecting transactions in securities in this state for the account of others or for his own account. "Broker-dealer" also includes a person engaged in the regular business of issuing or guaranteeing options with regard to securities not of his own issue.

CALIFORNIA DEBT AND INVESTMENT ADVISORY COMMISSION (CDIAC)

The CDIAC provides information, education, and technical assistance on public debt and investments to local public agencies and other public finance professionals. The Commission was created in 1981 with the passage of Chapter 1088, Statutes of 1981 (AB 1192, Costa), which established it as the State's clearinghouse for public debt issuance information and required it to assist state and local agencies with the monitoring, issuance, and management of public debt.

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(GLOSSARY OF TERMS – Continued)

CALLABLE SECURITIES

A callable security is a bond, preferred stock or debenture which may be redeemed or "called" by the issuing company prior to its maturity. The company may have the right to redeem all or part of the debt. Usually done by the company when interest rates drop. The company wants to replace expensive debt with lower-interest-rate debt.

CERTIFICATE OF DEPOSIT (CD)

A deposit of funds at a bank for a specified period of time that earns interest at a specified rate. Commonly known as "CDs." Institutional CDs are usually issued in denomination of \$100,000 or more. Maturities range from a few weeks to several years. Interest rates are set by competitive forces in the market place. (See **NEGOTIABLE CERTIFICATES OF DEPOSIT**)

COLLATERAL

Assets pledged as security for applicable investments. Pledged securities must meet the requirements of California law.

COMBINED POOL

The County maintains a combined pool with cash and investments which provide cash flow for the funding needs of the participants. Participants include County departments, agencies, schools, and special districts. The combined pool is managed by the San Luis Obispo County Treasurer. The combined pool portfolio is carried at amortized cost and includes accrued interest.

COMMERCIAL PAPER

Short-term unsecured obligations with maturities ranging from 2 to 270 days issued by banks, corporations, and other borrowers to investors with temporarily idle cash. Such instruments are usually discounted, although some are interest-bearing. It is issued only by top-rated concerns and is nearly always backed by bank lines of credit. Ratings are assigned by a nationally recognized rating service organization (NRSROs)

CONFIRMATION

Formal memorandum from a broker/dealer to the County Treasury giving the details of a securities transaction, i.e., purchase or sale. The confirmation is compared to the investment tracking system by authorized staff not directly supervised by investment personnel. Discrepancies shall be referred immediately to the Assistant Treasurer (provided that the Assistant Treasurer did not execute the transaction) or the County Treasurer. (See **DISCREPANCY**)

COUNTY TREASURY OVERSIGHT COMMITTEE (CTOC)

The CTOC was established in 1996. The committee consists of five members appointed from seven categories, County Treasurer, County Auditor-Controller, representative appointed by the County Board of Supervisors, County Superintendent of Schools or designee, representative of San Luis Obispo County School Boards, representative of San Luis Obispo County Special



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(GLOSSARY OF TERMS – Continued)

Districts, or public member. The duties include the following: a) review and monitor the annual investment policy, b) contract for an annual investment policy compliance audit, c) present the annual investment compliance audit to the Board of Supervisors, d) elect a chairperson and vice chairperson, e) ensure compliance with all provisions of the Ralph M. Brown Act, f) meet 45 days after the end of the quarter covered by the quarterly report, g) review the County Treasurer's Quarterly Report.

CUSTODIAN/CUSTODY

The financial institution where the investments purchased by the County Treasury are held.

DELIVERY VS. PAYMENT (DVP)

Delivery of securities purchased by the County Treasury is made to the County Treasurer's custodian in exchange for payment.

DERIVATIVE

An investment whose characteristics and value are based on the performance of an underlying financial asset, index or other investment. Derivatives include inverse floaters, range notes, or mortgage-derived, interest-only strips and any security that could result in zero interest accrual if held to maturity.

DISCOUNT

The difference between the bond's current market price and its face or redemption value. (See **PREMIUM**)

DISCREPANCY

A difference or variance from what is expected or stated. Any of the following discrepancies found in the County Treasury investment confirmation process are referred immediately to the Assistant Treasurer (provided that the Assistant Treasurer did not execute the transaction) or the County Treasurer. (See **CONFIRMATION**)

- A. Description of a security
- B. Broker information
- C. Purchase or maturity date
- D. Full value of a security
- E. Purchase price
- F. Interest amount
- G. Confirmation not received within 10 business days

DIVERSIFICATION

The spreading of risk by investing in a variety of securities offering independent returns.

FEDERAL AGRICULTURAL MORTGAGE CORPORATION (Farmer Mac)

Federal Agency established in 1988 to provide a secondary market for farm mortgage loans.

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(GLOSSARY OF TERMS – Continued)

FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC)

A federal agency that insures bank deposits, currently up to \$100,000.00 per deposit.

FEDERAL NATIONAL MORTGAGE ASSOCIATION (FNMA or Fannie Mae)

A publicly owned federally chartered corporation established in 1938. It carries a congressional mandate to promote a secondary market for conventional, Federal Housing Administration, and Veterans Administration single and multi-family mortgages. It is a publicly held company whose stock trades on the New York Stock Exchange. Both discount notes and bonds are issued.

FEDERAL HOME LOAN MORTGAGE CORPORATION (FHLMC or Freddie Mac)

A stockholder owned corporation established by Congress in 1970 to provide a continuous flow of funds to mortgage lenders, through developing and maintaining an active nationwide secondary market in conventional residential mortgages. It is a publicly held corporation whose stock trades on the New York Stock Exchange. Both discount notes and bonds are issued.

FEDERAL HOME LOAN BANK (FHLB)

A system of 12 regional banks, created in 1932, which are owned by private member institutions and regulated by the Federal Housing Finance Board (FHFB). Functioning as a credit reserve system, they facilitate extension of credit through owner-members in order to provide access to housing and to improve the quality of communities. It raises money by issuing notes and bonds and lends money to savings and loan associations and other mortgage lenders based on the amount of collateral the institution can provide. Both discount notes and bonds are issued.

FEDERAL FARM CREDIT SYSTEM (Farm Cr)

Established by the Farm Credit Act of 1971, this nationwide system of banks and associations provides mortgage loans, credit and related services to farmers, rural homeowners, and agricultural and rural cooperatives. The banks and associations are cooperatively owned, directly or indirectly, by their respective borrowers. The network of 12 Farm Credit District Banks issue securities on a consolidated basis. Both discount notes and bonds are issued.

FEDERAL RESERVE SYSTEM

System established by the Federal Reserve Act of 1913 to regulate the U.S. monetary and banking system. It is comprised of 12 regional Federal Reserve Banks, their 24 branches and all national and state banks that are part of the system.

FITCH RATINGS (FITCH)

One of the NRSROs utilized by the County Treasurer in determining eligibility for securities purchases. (See **NATIONALLY RECOGNIZED RATING SERVICE ORGANIZATION**)

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

(GLOSSARY OF TERMS – Continued)

GOVERNMENT SPONSORED ENTERPRISES (GSE)

A general term for several privately owned, publicly chartered agencies created to reduce borrowing costs for certain sectors of the economy such as farmers, homeowners and students. The GSEs that issue debt instruments as of the time of this printing include: Federal Home Loan Banks, Federal National Mortgage Association, Federal Home Loan Mortgage Corporation, Federal Farm Credit System, Federal Agricultural Mortgage Corporation, and the Student Loan Marketing Association.

INFORMAL COMPETITIVE BID

A verbal or written bid submitted to the County Treasury by a broker/dealer for a specific issue at a specific price or yield.

INTEREST

The amount earned while owning a debt security, generally calculated as a percentage of the principal.

INVESTMENT TRACKING SYSTEM

The Treasury Investment Manager System is currently utilized for the management of investments in the combined pool. (See **TREASURY INVESTMENT MANAGER (TIM) SYSTEM**)

ISSUER

Legal entity that has the power to issue and distribute a security. Issuers include corporations, municipalities, foreign and domestic governments and their agencies, and investment trusts.

LIQUIDITY

The ability to meet cash requirements by structuring the portfolio so that maturities meet anticipated cash flow needs as well as unanticipated cash flow needs by including marketable securities in the portfolio.

LOCAL AGENCY

County, city, city and county, including a chartered city or county, school district, community college district, public district, county board of education, county superintendent of schools, or any public or municipal corporation.

MARKET VALUE

The price at which a security is trading and could presumably be purchased or sold.

MARKETABLE SECURITIES

Marketable securities are securities that are easily sold. They are assets that can be readily converted into cash – for example, Treasuries, Agencies, Bankers Acceptances, and Commercial Paper.

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

(GLOSSARY OF TERMS – Continued)

MATURITY/MATURITY DATE

The date on which the principal amount of a security becomes due and payable.

MOODY'S INVESTORS SERVICE, INC. (MOODY'S)

One of the NRSROs utilized by the County Treasurer in determining eligibility for securities purchases. (See **NATIONALLY RECOGNIZED RATING SERVICE ORGANIZATION**)

MONEY MARKET MUTUAL FUNDS

Open ended mutual funds that invest in commercial paper, bankers acceptances, repurchase agreements, government securities, certificates of deposit, and other highly liquid and safe securities, and pay money market interest rates. The Net Asset Value (NAV) of these funds is managed to maintain at \$1.00.

NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION (NRSRO)

Rating agencies whose credit ratings are used under the Security and Exchange Commission's regulations. There are currently five officially designated NRSROs: Moody's, Standard & Poor's (S&P), Fitch, Dominion Bond Rating Services, and A.M. Best.

NEGOTIABLE CERTIFICATE OF DEPOSIT

A large-dollar amount short-term certificate of deposit. Such certificates are issued by large banks and bought mainly by corporations and institutional investors. They are payable either to the bearer or to the order of the depositor, and, being negotiable, they enjoy an active secondary market, where they trade in round lots of \$5 million. Although they can be issued in any denomination from \$100,000 up, the typical amount is \$1 million. They have a minimum original maturity of 14 days; most original maturities are under six months.

(See **CERTIFICATE OF DEPOSIT**)

PORTFOLIO

A group of securities held by an investor.

PREMIUM

Amount by which a bond sells above its face value. (See **DISCOUNT**)

PRIMARY DEALER

A group of government securities dealers that submit daily reports of market activity and positions and monthly financial statements to the Federal Reserve Bank of New York and are subject to its informal oversight. Primary dealers include Securities and Exchange Commission (SEC) registered securities broker-dealers and banks.

PRINCIPAL

The face value or par value of an investment.



Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

(GLOSSARY OF TERMS – Continued)

RECEIVABLE-BACKED SECURITIES

Securities collateralized with consumer receivables, which are owned by the issuer, but placed with a trustee for the benefit of the investor.

RECEIVABLE PASS-THROUGH CERTIFICATE

A debt obligation that is backed by a portfolio of receivables, normally issued by a bank or financial institution.

REGISTERED STATE WARRANT

A short-term obligation of a state governmental body issued in anticipation of revenue.

REPURCHASE AGREEMENT/TRI-PARTY, BI-PARTY

An agreement between a seller and a buyer, usually of government securities, whereby the seller agrees to repurchase the securities at an agreed upon price at a stated time. A TRI-PARTY repurchase agreement is where the purchased securities are in safekeeping with a custodian other than the seller or the buyer. A BI-PARTY repurchase agreement is where the purchased securities are in safekeeping with the seller.

RULE G-37 OF THE MUNICIPAL SECURITIES RULEMAKING BOARD

Federal regulations to sever any connection between the making of political contributions and the awarding of municipal securities.

SAFEKEEPING

Storage and protection of securities provided by an institution where control is designated by the County Treasury. (See **CUSTODIAN/CUSTODY**)

SECURITIES AND EXCHANGE COMMISSION (SEC)

Agency created by Congress to protect investors in securities transactions by administering securities acts. The statutes administered by the SEC are designed to promote full public disclosure and protect the investing public against malpractice in the securities market.

STANDARD AND POOR'S CORPORATION (S&P)

One of the NRSROs utilized by the County Treasurer in determining eligibility for securities purchases. (See **NATIONALLY RECOGNIZED RATING SERVICE ORGANIZATION**)

STUDENT LOAN MARKETING ASSOCIATION (SLMA OR SALLIE MAE)

A government sponsored entity created by the Higher Education Act of 1965 to provide liquidity for private lenders (banks, savings and loan associations, educational institutions, state agencies, and other lenders). It participates in the Federal Guaranteed Student Loan Program, supplemental loan programs, the Health Education Assistance Loan Program, and/or the PLUS loan program for parents of undergraduates. It is owned by its stockholders and its shares trade on the New York Stock Exchange. Both discount notes and bonds are issued.

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

(GLOSSARY OF TERMS – Continued)

TREASURER'S DAILY REPORT (TDR)

A report prepared daily by the County Treasury cashier summarizing the day's receipts and disbursements, investment activity, and cash. Month-to-date totals are also reported for receipts and disbursements. The TDR is submitted daily to the County Auditor-Controller. At month-end the TDR is submitted to the County Board of Supervisors, County Administrative Officer, and County Auditor-Controller.

TREASURY INVESTMENT MANAGER (TIM) SYSTEM

Database system used for the management of investments in the combined pool. Reports include the schedule of investments, specific percentage reports by type of instrument and broker, weighted average yield and life of the portfolio, purchase and maturities, quarterly interest accrual, and tracking of the carrying value of each instrument. TIM's reporting is audited quarterly by the County Auditor-Controller. (See **INVESTMENT TRACKING SYSTEM**)

TREASURY BILLS

Short-term obligations of the United States Government, usually sold at a discount. The U.S. Treasury issues range from a few days to 26 weeks.

TREASURY BONDS

Long term obligations of the United States Government. They are sold by cash subscription, in exchange for outstanding or maturing government issues. Maturities are ten years or longer.

TREASURY NOTES

Intermediate term obligations of the United States Government. They are sold by cash subscription, in exchange for outstanding or maturing government issues, or at auctions. Maturities range from one to ten years.

YIELD

Return on an investment. The County Treasury uses the following formula for calculating yield on securities held in the combined pool:

Earnings ÷ amount invested ÷ life of investment in days x 365 days

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Frank L. Freitas, CPA
San Luis Obispo County Treasurer

2006 INVESTMENT POLICY

Any comments or suggestions regarding this Investment Policy may be directed to:

- County Treasurer's Office
Attention: Designated Investment Officer
P.O. Box 1149
San Luis Obispo, CA 93406
- Telephone Number:
(805) 781-5842
- Fax Number:
(805) 781-1079
- E-mail Address:
ttc@co.slo.ca.us
- Website:
www.slocountytax.org

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**Treasurer
Tax Collector
Public Administrator
SAN LUIS OBISPO COUNTY**

Frank L. Freitas, CPA
Department Head

Donna L. Morris
Assistant

P.O. Box 1149 • Room D-290, County Government Center • San Luis Obispo, CA 93406-1149

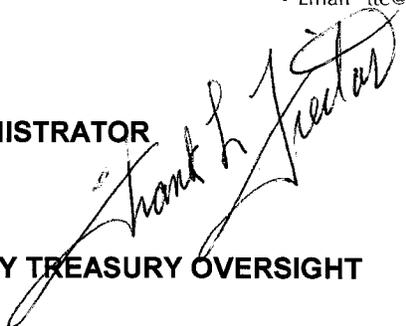
- Phone 805.781.5842
- Fax 805.781.1079
- Email ttc@co.slo.ca.us

TO: HONORABLE BOARD OF SUPERVISORS

**FROM: FRANK L. FREITAS, CPA
TREASURER, TAX COLLECTOR, PUBLIC ADMINISTRATOR**

DATE: JANUARY 10, 2006

**SUBJECT: CONFIRMATION OF NOMINEES TO THE COUNTY TREASURY OVERSIGHT
COMMITTEE FOR THE CALENDAR YEAR 2006**



Recommendation

It is recommended that your Honorable Board confirm the following persons for membership to the County Treasury Oversight Committee (CTOC) for the term ending December 31, 2006.

<u>Nominee:</u>	<u>Category:</u>
Clark Channing	Public Member
Jim Grant	Representative of the County Board of Supervisors
Mary Jarvis	County Superintendent of Schools Designee
Russell Miller	Representative of the Schools and Community College Districts
Gere W. Sibbach	County Auditor-Controller

Discussion

The CTOC promotes the public interest by involving Treasury pool participants and a member of the public in the oversight of the County Treasury.

The duties of CTOC include the following: a) review and monitor the annual investment policy; b) contract for an annual investment policy compliance audit; c) present the annual investment compliance audit to the Board of Supervisors; d) elect a chairperson and vice chairperson; e) ensure compliance with all provisions of the Ralph M. Brown Act; f) meet within 45 days after the end of the quarter covered by the quarterly report; g) review the County Treasurer's Quarterly Report.

The recommended nominees for the calendar year 2006 have completed the Application for Nomination and Affidavit of Understanding indicating that they are eligible to serve and will comply with the provisions of the law (see attached application for each nominee).

Other Agency Involvement/Impact

The agencies involved participated in the selection of their respective representative nominee.

Financial Consideration

Costs related to the CTOC will be included in the costs of managing funds. These nominal costs are deducted from earnings prior to quarterly interest apportionment.



Results

The confirmation of the nominees will provide for continued oversight of the County's investment program. This is consistent with the Treasury goal to "Maintain modern, efficient treasury cash management and banking systems, providing proper internal controls to safeguard, manage, and account for liquid assets."

Attachments: Nominee Applications

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SAN LUIS OBISPO COUNTY
TREASURY OVERSIGHT COMMITTEE (CTOC)



APPLICATION FOR NOMINATION AND AFFIDAVIT OF UNDERSTANDING

Person Being Considered for Nomination: Clark G. Channing	Occupation: Retired
Address: 245 Effie Way, Pismo Beach, CA 93449	Telephone No: (805) 489-8474

A. Eligibility Category (check on the left where applicable)	
<input type="checkbox"/>	1. County Treasurer
<input type="checkbox"/>	2. County Auditor-Controller
<input type="checkbox"/>	3. Representative appointed by the Board of Supervisors
<input type="checkbox"/>	4. County Superintendent of Schools or designee
<input type="checkbox"/>	5. Representative of San Luis Obispo County school boards
<input type="checkbox"/>	6. Representative of San Luis Obispo County special districts
<input checked="" type="checkbox"/>	7. Public member <ul style="list-style-type: none"> a. Expertise in, or an academic background in public finance (submit resume) b. Political registration: <u>Republican</u> c. Economic status

B. Other Requirements for Nomination and Appointment	
1.	Member may not have contributed or be employed by an entity that has contributed to the campaign of a County Treasurer candidate, County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool in the previous three years nor while a member of the CTOC, except that a member may contribute to his or her own campaign.
2.	Member may not directly or indirectly raise money for a County Treasurer candidate, the County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool while a member of the CTOC, except that a member may raise money for his or her own campaign.
3.	Member may not secure employment with bond underwriters, bond counsel, security brokerages or dealers, with financial services firms while a member of the CTOC and for three years after leaving the CTOC.
4.	Member may not receive any honoraria, gifts, and gratuities from advisors, brokers, dealers, bankers, or other persons who conduct business with the County Treasurer while a member of the CTOC.

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5. Member will be subject to the conflict of interest limitations in Government Code Section 1090 and Political Reform Act of 1974, Government Code Sections 87100 et. seq., as well as any reporting requirements in those sections while a member of the CTOC.
6. A member shall be a registered voter of the County of San Luis Obispo.
7. All meetings of the CTOC will be public meetings in accordance with the Ralph M. Brown Act.
8. Member shall be required to file an initial and, thereafter, an annual statement of Application for Nomination and Affidavit of Understanding with the County Treasurer. Filing is due by November 30 of each calendar year. The County Treasurer shall deliver a list of nominees by the first meeting of the Board of Supervisors in January of the following year.

C. AFFIDAVIT OF UNDERSTANDING AND COMPLIANCE

1. I understand that the mission of the County Treasury Oversight Committee is for the members to perform their duties according to the intent of the law in an objective and professional manner. Duties of the CTOC members follow:
 - a. Review and monitor the annual Investment Policy
 - b. Contract for an annual Investment Policy compliance audit
 - c. Present the annual Investment Policy compliance audit report to the Board of Supervisors
 - d. Members elect the following officers:
 - (i.) Chairperson - provides direction and presides in all CTOC meetings
 - (ii.) Vice Chairperson - provides direction and presides in CTOC meetings in the absence of the Chairperson
 - e. Ensure compliance with all the provisions of the Ralph M. Brown Act
 - f. Meet 45 days after the end of the quarter covered by the Quarterly Report
 - g. Review the County Treasurer's Quarterly Report
2. I understand and meet the eligibility criteria required for membership nomination.
3. I understand that eligibility for appointment will not guarantee nomination and appointment.
4. I understand that failure to comply with the eligibility criteria shall result in review and recommendation to the Board of Supervisors to terminate my CTOC membership.
5. I understand that three CTOC members shall constitute a quorum in a meeting.
6. I understand that three affirmative votes shall be needed to carry out direction or action.
7. I understand that by law, the CTOC, or any member thereof, except for the County Treasurer, shall not be allowed to direct or recommend individual investment decisions, select or recommend individual advisors, brokers, or dealers, or impinge on the day-to-day operations of the County Treasury.

Signature:

Blair G. Channing

Date:

11/8/2005

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Clark G Channing

245 Effie Way
Pismo Beach, Ca 93449
e-mail cgordonc@aol.com
Phone 805-489-8474

Objective

County Treasury Oversight Committee

Experience

Consultant – County Government 4/97 to present.
9/02/97 – 8/08/98 Interim County Administrative Officer San Luis Obispo County / Special Project Administrator

County of Merced – Merced, Ca - 5/62 –3/29-97

- County Administrator (7/76-3/29/97): Population 204,000; Total budget including Enterprise Funds totals 291,543,157. Responsible for budget, personnel department, employer/employee relations, data processing department, purchasing, economic development, and central duplicating. Attend Board of Supervisor's meetings and Hospital Governing Board meetings; complete numerous staff reports; ten years of cutback management due to local and state fiscal restraints.

Accomplishments as County Administrator:

- Updated County Administrator's Ordinance
- Implemented management by objectives in budget process
- Implemented team management development program using Dr. La Baron
- Implemented Management Council advisory to County Administration and Board of Supervisors
- Established budget team, which included the County Administrator's and County Auditor' staff – met weekly
- Assumed responsibility for economic development program
- Implemented legislative program – Merced County first small County to hire an advocate in Sacramento (1983)
- Testified before Congress on local refugee issues
- Testified before State Assembly and Senate Committees on County issues
- Implemented fleet service program, which reduced number of County Vehicles and improved maintenance
- Implemented refugee service program
- Worked in conjunction with Clerk of Board Supervisors to up grade agenda process. Upon retirement of County Clerk became Clerk of The Board
- County received 29 certificates of merit for programs developed by County Departments from the National Associations of Counties
- Provided direction to fully automating and reengineering welfare administration
- Served on CSAC team to achieve realignment of Health, Welfare and Mental Health programs
- Provided transition upon notice retirement after 20 years as CAO

Assistant County Administrator (8/68 to 7/76): Acting County Administrator two years (1974-1976). Acted as Merced Community Medical Center Administrator during August and September 1973.

Accomplishments as Assistant County Administrator:

- Served on negotiation team for labor relations for eight years

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- Worked with Stanislaus State College to establish student intern program
- Responsible for establishing capital improvement program for Merced County
- Assigned as staff project person for development of 84,000 square foot County Administration building
- Responsible for implementing Risk Management Program
- In conjunction with County Auditor, facilitated upgrading of County financial system, and as a result, auditor's office received National Municipal Financial Officer's Association's Certificate of Merit for their Financial statements.

Accomplishments as Acting Hospital Administrator:

- Facilitated need for contract management of hospital
- Worked with financing and construction of hospital facilities
- Responsible for forming task force for Medical Indigent costs and assuring that patients were assigned to appropriate programs

Senior Administrative Analyst – (7/65 to 8/68): Responsible for implementing Meyers Milias Brown Labor relations. Responsible for personnel functions for the County.

Administrative Analyst (5/62 To 6/65): Completed study and responsible for implementation of County data processing system, served as coordinator to Department users group

Military

- United States Army Security Agency – Ford Ord, CA 1959 to 1962

Education

- University of California – Bachelor of Arts Degree (Political Science with emphasis in Public Administration) 1959

Professional Organizations/Affiliations

- Appointed by State Controller, Ken Cory, to Committee on County Accounting Procedures – March, 1986
- International City Managers' Association
- National Association of County Administrators
- County Administrator's Association of California (President 1990, President 1991)
- San Joaquin Valley Supervisors Association (past secretary)
- City/County Relations Committee (past secretary)
- Technical Review Board – Merced County Association of Governments
- Lions Club (past president through deputy district governor)
- Merced/Mariposa Cancer Society (past president)
- MERCO Credit Union Board Member – 13 years (past president)
- Merced Airport Authority (first president)
- Elks Club
- City Chamber of Commerce (ex officio member)
- County Chamber of Commerce (ex officio member)
- Junior Chamber of Commerce Young Man of the Year - 1969

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SAN LUIS OBISPO COUNTY
TREASURY OVERSIGHT COMMITTEE (CTOC)



APPLICATION FOR NOMINATION AND AFFIDAVIT OF UNDERSTANDING

Person Being Considered for Nomination: Jim Grant	Occupation: Assistant County Administrator
Address: 1055 Monterey D-430, County Government Center San Luis Obispo, CA 93408	Telephone No: (805) 781-5011

A. Eligibility Category (check on the left where applicable)	
	1. County Treasurer
	2. County Auditor-Controller
X	3. Representative appointed by the Board of Supervisors
	4. County Superintendent of Schools or designee
	5. Representative of San Luis Obispo County school boards
	6. Representative of San Luis Obispo County special districts
	7. Public member <ul style="list-style-type: none"> a. Expertise in, or an academic background in public finance (submit resume) b. Political registration _____ c. Economic status _____

B. Other Requirements for Nomination and Appointment	
1.	Member may not have contributed or be employed by an entity that has contributed to the campaign of a County Treasurer candidate, County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool in the previous three years nor while a member of the CTOC, except that a member may contribute to his or her own campaign.
2.	Member may not directly or indirectly raise money for a County Treasurer candidate, the County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool while a member of the CTOC, except that a member may raise money for his or her own campaign.
3.	Member may not secure employment with bond underwriters, bond counsel, security brokerages or dealers, with financial services firms while a member of the CTOC and for three years after leaving the CTOC.

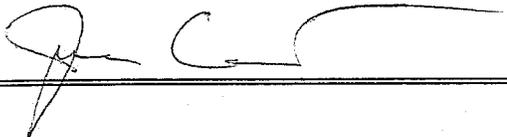
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4. Member may not receive any honoraria, gifts, and gratuities from advisors, brokers, dealers, bankers, or other persons who conduct business with the County Treasurer while a member of the CTOC.
5. Member will be subject to the conflict of interest limitations in Government Code Section 1090 and Political Reform Act of 1974, Government Code Sections 87100 et. seq., as well as any reporting requirements in those sections while a member of the CTOC.
6. A member shall be a registered voter of the County of San Luis Obispo.
7. All meetings of the CTOC will be public meetings in accordance with the Ralph M. Brown Act.
8. Member shall be required to file an initial and, thereafter, an annual statement of Application for Nomination and Affidavit of Understanding with the County Treasurer. Filing is due by November 30 of each calendar year. The County Treasurer shall deliver a list of nominees by the first meeting of the Board of Supervisors in January of the following year.

C. AFFIDAVIT OF UNDERSTANDING AND COMPLIANCE

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 - b. Contract for an annual Investment Policy compliance audit
 - c. Present the annual Investment Policy compliance audit report to the Board of Supervisors
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 - f. Meet 45 days after the end of the quarter covered by the Quarterly Report
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4. I understand that failure to comply with the eligibility criteria shall result in review and recommendation to the Board of Supervisors to terminate my CTOC membership.
5. I understand that three CTOC members shall constitute a quorum in a meeting.
6. I understand that three affirmative votes shall be needed to carry out direction or action.
7. I understand that by law, the CTOC, or any member thereof, except for the County Treasurer, shall not be allowed to direct or recommend individual investment decisions, select or recommend individual advisors, brokers, or dealers, or impinge on the day-to-day operations of the County Treasury.

Signature:



Date:

10/5/05

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SAN LUIS OBISPO COUNTY
TREASURY OVERSIGHT COMMITTEE (CTOC)



APPLICATION FOR NOMINATION AND AFFIDAVIT OF UNDERSTANDING

Person Being Considered for Nomination: Mary Jarvis	Occupation: Assistant Superintendent for Business
Address: 3350 Education Drive, San Luis Obispo, CA 93405	Telephone No: (805) 782-7210

A. Eligibility Category (check on the left where applicable)	
	1. County Treasurer
	2. County Auditor-Controller
	3. Representative appointed by the Board of Supervisors
X	4. County Superintendent of Schools or designee
	5. Representative of San Luis Obispo County school boards
	6. Representative of San Luis Obispo County special districts
	7. Public member
	a. Expertise in, or an academic background in public finance (submit resume)
	b. Political registration _____
	c. Economic status _____

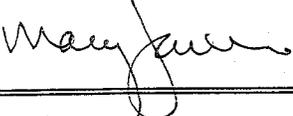
B. Other Requirements for Nomination and Appointment	
1.	Member may not have contributed or be employed by an entity that has contributed to the campaign of a County Treasurer candidate, County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool in the previous three years nor while a member of the CTOC, except that a member may contribute to his or her own campaign.
2.	Member may not directly or indirectly raise money for a County Treasurer candidate, the County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool while a member of the CTOC, except that a member may raise money for his or her own campaign.
3.	Member may not secure employment with bond underwriters, bond counsel, security brokerages or dealers, with financial services firms while a member of the CTOC and for three years after leaving the CTOC.

Handwritten initials/signature

4. Member may not receive any honoraria, gifts, and gratuities from advisors, brokers, dealers, bankers, or other persons who conduct business with the County Treasurer while a member of the CTOC.
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5. I understand that three CTOC members shall constitute a quorum in a meeting.
6. I understand that three affirmative votes shall be needed to carry out direction or action.
7. I understand that by law, the CTOC, or any member thereof, except for the County Treasurer, shall not be allowed to direct or recommend individual investment decisions, select or recommend individual advisors, brokers, or dealers, or impinge on the day-to-day operations of the County Treasury.

Signature: 	Date: 10/5/05
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Handwritten initials/signature

SAN LUIS OBISPO COUNTY
TREASURY OVERSIGHT COMMITTEE (CTOC)



APPLICATION FOR NOMINATION AND AFFIDAVIT OF UNDERSTANDING

Person Being Considered for Nomination: Russell Miller	Occupation: Assistant Superintendent for Business Services
Address: San Luis Coastal Unified School District 1500 Lizzie Street, San Luis Obispo, CA 93401	Telephone No: (805) 549-1331

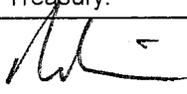
A. Eligibility Category (check on the left where applicable)	
<input type="checkbox"/>	1. County Treasurer
<input type="checkbox"/>	2. County Auditor-Controller
<input type="checkbox"/>	3. Representative appointed by the Board of Supervisors
<input type="checkbox"/>	4. County Superintendent of Schools or designee
<input checked="" type="checkbox"/>	5. Representative of San Luis Obispo County school boards
<input type="checkbox"/>	6. Representative of San Luis Obispo County special districts
<input type="checkbox"/>	7. Public member <ul style="list-style-type: none"> a. Expertise in, or an academic background in public finance (submit resume) b. Political registration _____ c. Economic status _____

B. Other Requirements for Nomination and Appointment	
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3.	Member may not secure employment with bond underwriters, bond counsel, security brokerages or dealers, with financial services firms while a member of the CTOC and for three years after leaving the CTOC.

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4. Member may not receive any honoraria, gifts, and gratuities from advisors, brokers, dealers, bankers, or other persons who conduct business with the County Treasurer while a member of the CTOC.
5. Member will be subject to the conflict of interest limitations in Government Code Section 1090 and Political Reform Act of 1974, Government Code Sections 87100 et. seq., as well as any reporting requirements in those sections while a member of the CTOC.
6. A member shall be a registered voter of the County of San Luis Obispo.
7. All meetings of the CTOC will be public meetings in accordance with the Ralph M. Brown Act.
8. Member shall be required to file an initial and, thereafter, an annual statement of Application for Nomination and Affidavit of Understanding with the County Treasurer. Filing is due by November 30 of each calendar year. The County Treasurer shall deliver a list of nominees by the first meeting of the Board of Supervisors in January of the following year.

C. AFFIDAVIT OF UNDERSTANDING AND COMPLIANCE

1. I understand that the mission of the County Treasury Oversight Committee is for the members to perform their duties according to the intent of the law in an objective and professional manner. Duties of the CTOC members follow:
 - a. Review and monitor the annual Investment Policy
 - b. Contract for an annual Investment Policy compliance audit
 - c. Present the annual Investment Policy compliance audit report to the Board of Supervisors
 - d. Members elect the following officers:
 - (i.) Chairperson - provides direction and presides in all CTOC meetings
 - (ii.) Vice Chairperson - provides direction and presides in CTOC meetings in the absence of the Chairperson
 - e. Ensure compliance with all the provisions of the Ralph M. Brown Act
 - f. Meet 45 days after the end of the quarter covered by the Quarterly Report
 - g. Review the County Treasurer's Quarterly Report
 2. I understand and meet the eligibility criteria required for membership nomination.
 3. I understand that eligibility for appointment will not guarantee nomination and appointment.
 4. I understand that failure to comply with the eligibility criteria shall result in review and recommendation to the Board of Supervisors to terminate my CTOC membership.
 5. I understand that three CTOC members shall constitute a quorum in a meeting.
 6. I understand that three affirmative votes shall be needed to carry out direction or action.
 7. I understand that by law, the CTOC, or any member thereof, except for the County Treasurer, shall not be allowed to direct or recommend individual investment decisions, select or recommend individual advisors, brokers, or dealers, or impinge on the day-to-day operations of the County Treasury.
- Signature:  Date: 10/7/05

10/7/05

SAN LUIS OBISPO COUNTY
TREASURY OVERSIGHT COMMITTEE (CTOC)



APPLICATION FOR NOMINATION AND AFFIDAVIT OF UNDERSTANDING

Person Being Considered for Nomination: Gere W. Sibbach	Occupation: County Auditor-Controller
Address: 1055 Monterey, D-220 County Government Center San Luis Obispo, CA 93408	Telephone No: (805) 781-5041

A. Eligibility Category (check on the left where applicable)	
<input type="checkbox"/>	1. County Treasurer
<input checked="" type="checkbox"/>	2. County Auditor-Controller
<input type="checkbox"/>	3. Representative appointed by the Board of Supervisors
<input type="checkbox"/>	4. County Superintendent of Schools or designee
<input type="checkbox"/>	5. Representative of San Luis Obispo County school boards
<input type="checkbox"/>	6. Representative of San Luis Obispo County special districts
<input type="checkbox"/>	7. Public member <ul style="list-style-type: none"> a. Expertise in, or an academic background in public finance (submit resume) b. Political registration _____ c. Economic status _____

B. Other Requirements for Nomination and Appointment	
1.	Member may not have contributed or be employed by an entity that has contributed to the campaign of a County Treasurer candidate, County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool in the previous three years nor while a member of the CTOC, except that a member may contribute to his or her own campaign.
2.	Member may not directly or indirectly raise money for a County Treasurer candidate, the County Treasurer, or any candidate for a San Luis Obispo County legislative body with deposits in the Treasury Pool while a member of the CTOC, except that a member may raise money for his or her own campaign.
3.	Member may not secure employment with bond underwriters, bond counsel, security brokerages or dealers, with financial services firms while a member of the CTOC and for three years after leaving the CTOC.
4.	Member may not receive any honoraria, gifts, and gratuities from advisors, brokers, dealers, bankers, or other persons who conduct business with the County Treasurer while a member of the CTOC.
5.	Member will be subject to the conflict of interest limitations in Government Code Section 1090

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