

**CARSON CITY, NEVADA**  
A CONSOLIDATED MUNICIPALITY  
INVESTMENT AND PORTFOLIO POLICY



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I. INTRODUCTION

The investment of the surplus funds of Carson City, a consolidated municipality (hereinafter referred to as the "City"), is a function performed by the City Treasurer following policy acknowledgment by the City Board of Supervisors. The investment program's operation is the responsibility of the City Treasurer.

It is the intent of this policy to establish guidelines for the prudent investment of these City funds.

II. SCOPE

This policy applies to activities of the City with regards to the investing of the financial assets of all funds, including the following:

General Fund  
Special Revenue Funds  
Capital Project Funds  
Enterprise Funds  
Debt Service Funds  
Internal Service Funds  
Trust and Agency Funds

III. OBJECTIVES

The primary objectives of the investment activities, in priority order, shall be:

**Safety:** Safety of principal is the foremost objective of the City's investment program. Investments by the City Treasurer shall be undertaken in a manner that seeks to ensure the preservation of principal in the overall portfolio.

**Liquidity:** The City's investment portfolio will remain sufficiently liquid to enable the City to meet all operating requirements which might be reasonably anticipated.

**Return on Investment:** The City's portfolio shall be invested with the objective of obtaining an appropriate market rate of return in relation to the prevailing budgetary and economic environments. This would take into account the City's investment risk constraints and the cash flow needs of the City.

IV. PERFORMANCE EVALUATION

The City's portfolio will be invested to obtain a market rate of return consistent with its cash flow requirements and risk constraints, and the dependence upon budgetary and economic factors. The City's investment strategy is generally that of a "buy-and-hold" investor, but the City also has the ability to take advantage of market opportunities as they occur by analyzing projected cash flow to assess the availability of uncommitted money. Given this strategy, the benchmarks used by the City to determine whether competitive market returns are being achieved will be comparing the portfolio's performance to (1) a market index comprised of securities representing a portfolio with a target duration suitable for the City's portfolio; and (2) a custom benchmark that contains the "prominent and persistent" characteristics of the portfolio. The benchmarks will be adjusted periodically when material, long-term changes of the portfolio's sector allocations and weighted

average maturity occur.

V. AUTHORIZATION

Funds of the City will be invested in compliance with the provisions of Nevada Revised Statutes (NRS) Chapter 355.167 through 355.200, and other applicable statutes including Chapter 350.659. Investments will be in accordance with these policies and written administrative procedures. Investment of any tax exempt borrowing proceeds and of any Debt Service Fund will comply with the 1986 Tax Reform Bill provisions referring to the Internal Revenue Code Section 148 which deals with arbitrage.

VI. PRUDENCE

The standard of prudence to be used by authorized treasury personnel shall be the following "prudent person" standard, as hereafter quoted, and shall be applied in the context of managing the overall portfolio.

"Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived."

VII. AUTHORIZED INVESTMENTS

The City Treasurer, in accordance with the provisions of NRS 355.170, 355.171, 355.180, and this investment policy, is authorized to invest in:

- A. United States Treasury Bills, Notes, and Bonds and other obligations unconditionally guaranteed by the U.S. Government. Maximum maturity shall be 10 years
- B. United States Government Agency Securities:
  - 1. Federal National Mortgage Association (Fannie Mae)
  - 2. Federal Home Loan Bank
  - 3. Federal Farm Credit Bank
  - 4. Federal Home Loan Mortgage Corporation (Freddie Mac)
  - 5. The Federal Agricultural Mortgage Corporation (Farmer Mac)
  - 6. Other U.S. agency obligations whose principal and interest are guaranteed by the U.S. Government.
  - 7. Maximum maturity shall be 10 years
- C. Negotiable Certificates of Deposit;
  - 1. Issued by commercial banks.
  - 2. Issued by insured savings and loan associations.
  - 3. No more than 5% may be invested in Banks that have a rating of A-1 or P-1, or its equivalent or better by a national recognized rating service.
  - 4. If not rated, the maximum allowable limit will be up to the FDIC Insurable amount
  - 5. Maximum maturity shall be 5 years.
- D. Bankers' Acceptances;
  - 1. Maximum maturity of 180 days.
  - 2. Must be rated by a nationally recognized rating service as A-1 or P-1 or its

equivalent or better.

E. Commercial Paper;

1. At the time of purchase has a remaining term to maturity of no more than 270 days.
2. Must be rated by a nationally recognized rating service as "A-1", "P-1", or its equivalent, or better.
3. Issued by a corporation organized and operating in the United States or by a depository institution licensed by the United States or any state and operating in the United States.
4. Purchased from a registered broker/dealer.

F. Money Market Mutual Funds;

1. Rating must be AAA or its equivalent by a nationally recognized rating service.
2. Invests only in securities issued by the Federal Government or its agencies or in repurchase agreements fully collateralized by such securities.

H. Time Certificates of Deposit;

Uninsured time certificates of deposit with commercial banks and insured savings and loan associations shall be collateralized in the manner prescribed by NRS 356.133 for depositories accepting City investment funds.

I. Corporate Obligations;

1. Notes, bonds, and other unconditional obligations for the payment of money issued by corporations organized and operating in the United States that are purchased from a registered broker/dealer.
2. At the time of purchase have a remaining term to maturity of no more than 5 years.
3. Must be rated by a nationally recognized rating service as "A" or its equivalent, or better.

J. Asset-Backed Securities;

1. Must be rated by a nationally recognized rating service as "AAA" or its equivalent.
2. Must be purchased from a registered broker/dealer.

K. Collateralized Mortgage Obligations;

1. Must be rated by a nationally recognized rating service as "AAA" or its equivalent.
2. Must be purchased from a registered broker/dealer.

VIII. FUNDS INVESTED WITH STATE TREASURER

Funds invested with the State Treasurer in the LGIP or NVEST portfolios may be invested as permitted by NRS 355.167.

IX. SAFEKEEPING/CUSTODY AND DELIVERY

Securities purchased by the City Treasurer, as well as collateral for time certificates of deposit over the current FDIC insurance limit, shall be delivered against payment and held in a custodial safekeeping account with the trust department of a bank acting as a third-party custodian. (NRS 355.172)

This bank will be designated by the City Treasurer and all transactions will be evidenced by safekeeping receipts.

Time certificates of deposit may be held by the City Treasurer alone or in conjunction with an agency for which the certificate of deposit constitutes a bond deposit.

#### X. MATURITIES

- A. Liquidity: To the extent possible, investment maturities must match the anticipated cash flow requirements. Portfolio management procedures will provide for the assessment of net cash flow positions for at least a three month period.
- B. Market Risk: Market risk relates to the continuous price fluctuations of marketable securities that may result in a loss to the City if cash flow requirements force a premature sale.  
  
Portfolio maturities must be structured to avoid the forced sale of securities in any but the most severe circumstances. To this end, portfolio management procedures will provide for the projection of a "Minimum Liquidity Requirement" for the City's operating fund.
- C. Minimum Liquidity Requirement: This is defined as the total cash flow needed to pay City obligations for a period of four weeks. All securities to be included in the "Minimum Liquidity Requirement" must mature within 28 days.
- D. Intermediate Market Investment: That portion of City funds remaining after deletion of the "Minimum Liquidity Requirement" may be invested in the intermediate market, defined herein as instruments maturing between zero and ten years.
- E. No US bonds, debentures, bills, notes, agency obligations or other securities may have a maturity date of more than 10 years from the date of purchase. ABS and CMO securities are an exemption to this rule.
- F. Securities purchased by money managers under the provisions of NRS 355.171 may have a longer stated maturity date.

#### XI. DIVERSIFICATION

Assets held in the investment portfolio shall be diversified to eliminate the risk of loss resulting from over-concentration of assets in a specific class of securities

With the exception of United States Treasury, government agency securities, money market funds, and FDIC insured certificates of deposit, no more than 20% of the total book value of the portfolio will be invested in a single security type, and no more than 5% shall be invested in any one issuer..

#### XII. AUTHORIZED FINANCIAL DEALERS AND INSTITUTIONS

The City Treasurer will maintain a list of approved broker/dealers and financial institutions which are authorized to provide investment services to the City. Authorized broker/dealers will be

limited to "primary" dealers or other dealers that qualify under SEC Rule 15C3-1, the Uniform Net Capital Rule.

The City Treasurer shall conduct periodic reviews to identify those firms which offer diverse approaches, access to markets, analysis, and interpretations needed to effectively manage the portfolio. All approved firms are expected to be familiar with the precautions appropriate to public sector investments while also being expected to familiarize themselves with the City's investment objectives, policies, and constraints. Exclusions to this rule apply to brokers/dealers used by a Registered Investment Advisors appointed by the City to manage investments.

XIII. APPOINTMENT OF INVESTMENT MANAGERS

The City Treasurer may contract with investment managers at the discretion of the Treasurer. Any such investment manager shall hold the 'Registered Investment Advisor' designation with the SEC. Such managers shall sign contracts affirming their acceptance of fiduciary responsibility for funds under their management and follow the "prudent investor rule" as a fiduciary to the City. Managers will also follow the precepts of the City's investment policy and any other written restrictions placed upon them. Once approved by the State Board of Finance, they may additionally invest in securities as defined in NRS 355.171.

XIV. REPORTING

The City Treasurer will make available at any time upon request of the Finance Department or City Manager sufficient information to permit an evaluation of the performance of the investment program. The purpose for these reports will be to formulate suggestions for improved future performance, and to verify that authorized city treasury personnel have acted in accordance with the investment policy and written investment procedures

XV. INTERNAL CONTROLS


The City Treasurer's office is subject to periodic audits by the City's Internal Auditor, including unscheduled cash and securities counts. The investment portfolio will be audited annually by the City's independent auditor.

XVI. INVESTMENT OF BOND PROCEEDS

If bond covenants are more restrictive than this policy, the bond proceeds will be invested in full compliance with those restrictions.

XVII. ADOPTION

Adopted by the Carson City Treasurer

  
Gayle Robertson, Carson City Treasurer

Date: September 19, 2018