



RESOLUTION 2009-758

**A RESOLUTION OF THE MAYOR AND COMMON COUNCIL
OF THE TOWN OF CAMP VERDE, YAVAPAI COUNTY, ARIZONA,
ADOPTING THAT CERTAIN DOCUMENT
FILED WITH THE TOWN CLERK AND ENTITLED
"TOWN OF CAMP VERDE INVESTMENT POLICY".**

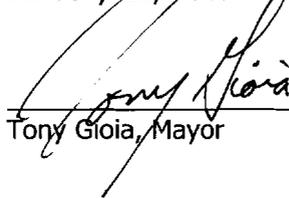
Whereas, the Town of Camp Verde desires to create a guide for the investment of Town of Camp Verde funds to outline proper investing, desired outcomes and priorities; and

Whereas, the Town of Camp Verde's objective is to maintain the safety of principal, maintain liquidity to meet cash flow needs and provide competitive investment returns; and

Whereas, the Town of Camp Verde's investment program must operate in conformance with Federal, State and other legal requirements, including, but not limited to, those requirements set forth in A.R.S. §35-323.

NOW THEREFORE BE IT RESOLVED, that the Town of Camp Verde's Investment Policy shown on the accompanying documents, is hereby adopted as the Investment Policy of the Town of Camp Verde.

Passed and adopted by a majority vote of the Common Council at the regular meeting of January 21, 2009.

 1/23/09

Tony Gioia, Mayor

Attest:



Deborah Barber, Town Clerk

Approved as to form:



Town Attorney



Investment Policy
For
Town of Camp Verde, Arizona

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Investment Policy
For
Town of Camp Verde, Arizona

I. Purpose

The purpose of this policy is to create a guide for the investment of Town of Camp Verde (hereinafter referred to as "the Town") funds. The Town currently has no written guidelines advising how the Town should invest its funds, nor guidelines detailing the desired outcomes and priorities. The Town also desires to take advantage of resources not available to the Town through the Local Government Investment Pool.

Therefore, it is the investment policy of the Town and its designee, the Finance Director (hereinafter referred to as "the Finance Director"), to maintain the safety of principal, maintain liquidity to meet cash flow needs and provide competitive investment returns as identified below. The Finance Director will strive to invest with the judgment and care that prudent individuals would exercise in their own affairs.

II. Governing Authority

The investment program of the Town shall be operated in conformance with Federal, State and other legal requirements, primarily outlined in A.R.S. §35-323.

III. Approval of the Investment Policy

The investment policy shall be formally approved and adopted by the Town Council and reviewed on or about July 1 of every odd numbered year by the Town Council or their designee.

IV. Scope

- This policy is designed to apply to the investment needs of the Town.
- The Town will consolidate cash and reserve balances from all funds in order to maximize investment earnings and to increase efficiencies with regard to investment management pricing, safekeeping costs and administration costs, except for cash in certain restricted and/or special funds, which are exempted from this policy.
- Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.
- The Finance Director will follow A.R.S. §35-323 and other investment guidelines mandated by statute. Investments that need to restrict yield for purposes of the Internal Revenue Service's Arbitrage Bond Regulations (Treasury Regulation Section 1.148-1 *et seq.*) will be deposited into a separate account and invested in a manner that meets arbitrage guidelines permitted by the IRS.

V. Investment Policy Objectives

The primary investment objectives of the Town in order of priority are:

- Safety
- Liquidity
- Optimal yield
- Collateralization

These objectives are defined below:

Safety - Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to prudently mitigate credit risk and interest rate risk. It is understood by the Town that no investment is completely free of risk.

a. Credit Risk

The Town will seek to mitigate credit risk, which is defined as the risk of loss due to the failure of the security issuer or backer. Mitigating credit risk is to be accomplished by:

- Limiting investments in the portfolio to the asset classes designated as acceptable in A.R.S. §35-323. When possible, analysis of the credit worthiness of all individual debt issuers held in the portfolio should be conducted on an annual basis in an effort to guard against investing in weak or deteriorating credit situations;
- Diversifying the investment portfolio so that the impact of potential losses from any one individual issuer held in the portfolio will be limited. Specific diversification parameters will be noted in Section VIII. Portfolio Criteria;
- Utilizing external research and advice regarding the current global economic condition and its impact on the outlook for domestic corporate credit quality.

b. Interest Rate Risk

The Town will seek to mitigate interest rate risk, which is defined as the risk that the market value of securities held in the portfolio will decline due to increases in market interest rates subsequent to their purchase. This mitigation will be accomplished by:

- Structuring the investment portfolio so that securities mature concurrent with the anticipated cash requirements for ongoing operations, thereby avoiding, as much as possible, the need to sell securities in an adverse market environment prior to maturity;
- Investing funds primarily in shorter-term securities or similar investment pools and limiting the average maturity of the portfolio in accordance with the needs of the Town;
- Utilizing external research and advice regarding the current interest rate outlook and global economic condition to optimize portfolio duration strategy.

Liquidity - The investment portfolio shall remain sufficiently liquid to meet anticipated cash flow requirements. This is to be accomplished by structuring the portfolio so that securities mature concurrent with anticipated cash flow needs (static liquidity). Furthermore, because all possible cash demands cannot be anticipated, the portfolio should consist of securities for which there exist active secondary markets (dynamic liquidity). Alternately, a portion of the portfolio may be placed in money market mutual funds or the Local Government Investment Pool which offers same-day liquidity for short-term funds.

Optimal Yield - Return on investment is of lesser importance compared to the safety and liquidity objectives described above. The investment portfolio shall be designed to optimize the yield the Town obtains from the portfolio taking into account the criteria of the investment policy, the dynamic liquidity needs of the Town and the current interest rate outlook/economic condition.

Collateralization – Securities will be registered in the name of the Town of Camp Verde.

VI. Investment Management Authority

Authority to manage internally or to delegate the management of the investment program of the Town to an external manager is granted to the Finance Director.

If authority to manage all or a part of the investment program of the Town is delegated to an external manager, the Finance Director is responsible for:

- Periodic investment portfolio reporting;
- Evaluating the performance of the externally managed portfolio;
- Monitoring manager compliance with the investment policy;
- Conveying the investment needs of the Town to the external manager;
- Developing investment strategy with the external manager.

VII. Brokers/Dealers

When the Town is investing directly with Brokers/Dealers, investment transactions shall only be conducted with financial institutions that are licensed, as may be required by law, to do business in Arizona. Primary government securities dealers or broker-dealers, engaged in the business of selling government securities, shall be registered in compliance with section 15 or 15C of the Securities Exchange Act of 1934 and registered pursuant to A.R.S. §44-3101, as amended. In addition, investment transactions shall be conducted only with those direct issuers who meet both credit and capital requirements established by the Finance Director. It shall be the responsibility of the broker-dealer to provide the following:

- Audited, most recent annual financial statements within six months of the close of the fiscal year;
- Unaudited, most recent quarterly financial statements;
- Proof of National Association of Security Dealers certification;
- Proof of Arizona registration (as needed);
- A signed letter acknowledging that they have read and agree to abide by the investment policy.

VIII. Portfolio Criteria

Acceptable Asset Classes

As of 4/16/2007, A.R.S. §35-323A defines the acceptable asset classes available for the Town to invest in as follows:

1. Certificates of deposit in eligible depositories.
2. Certificates of deposit in one or more Federally insured banks or savings and loan associations in accordance with the procedures prescribed in Section 35-323.01.
3. Interest bearing savings accounts in banks and savings and loan institutions doing business in this state whose accounts are insured by federal deposit insurance for their industry, but only if deposits in excess of the insured amount are secured by the eligible depository to the same extent and in the same manner as required under this article.
4. Repurchase agreements with a maximum maturity of one hundred eighty days.
5. The pooled investment funds established by the state treasurer pursuant to § 35-326.
6. Obligations issued or guaranteed by the United States or any of the senior debt of its agencies, sponsored agencies, corporations, sponsored corporations or instrumentalities.
7. Bonds or other evidences of indebtedness of this state or any of its counties, incorporated cities or towns or school districts.
8. Bonds, notes or evidences of indebtedness of any county, municipal district, municipal utility or special taxing district within this state that are payable from revenues, earnings or a special tax specifically pledged for the payment of the principal and interest on the obligations, and for the payment of which a lawful sinking fund or reserve fund has been established and is being maintained, but only if no default in payment on principal or interest on the obligations to be purchased has occurred within five years of the date of investment, or, if such obligations were issued less than five years before the date of investment, no default in payment of principal or interest has occurred on the obligations to be purchased nor any other obligations of the issuer within five years of the investment.

9. Bonds, notes or evidences of indebtedness issued by any county improvement district or municipal improvement district in this state to finance local improvements authorized by law, if the principal and interest of the obligations are payable from assessments on real property within the improvement district. An investment shall not be made if:
 - (a) The face value of all such obligations, and similar obligations outstanding, exceeds fifty per cent of the market value of the real property, and if improvements on which the bonds or the assessments for the payment of principal and interest on the bonds are liens inferior only to the liens for general ad valorem taxes.
 - (b) A default in payment of principal or interest on the obligations to be purchased has occurred within five years of the date of investment, or, if the obligations were issued less than five years before the date of investment, a default in the payment of principal or interest has occurred on the obligations to be purchased or on any other obligation of the issuer within five years of the investment.
10. Commercial paper of prime quality that is rated "P1" by Moody's Investor Service or rated "A1" or better by Standard and Poor's rating service or their successors. All commercial paper must be issued by corporations organized and doing business in the United States.
11. Bonds, debentures and notes that are issued by corporations organized and doing business in the United States and that are rated "A" or better by Moody's Investor Service or Standard and Poor's rating service or their successors.

All other investments are thereby prohibited from consideration for investment. Furthermore, the Town may desire to be more conservative in its investment portfolio and restrict or prohibit certain of the investments listed above.

Benchmark

The performance of an actively managed portfolio on behalf of the Town will be expected to at least match the performance of the Local Government Investment Pool during any one-year period.

Occasionally, based on the liquidity needs and the portfolio strategy of the Town it may be reasonable and desirable to measure portfolio performance against a total return benchmark. The Finance Director shall define such a benchmark after consultation with professionals in the field of financial management and the Town Council.

Maturity Parameters

Funds Maximum Maturity:	3 Years
Maximum Maturity for Repurchase Agreements:	180 Days
Portfolio Duration Target:	To be defined by the Finance Director in consultation with the Town Council.
Portfolio Duration Range:	+ / - 20% of the Portfolio Duration Target

Concentration and Diversification

At the time of purchase a maximum of 5% of the market value of the portfolio may be invested in debt issued by any single entity. Debt backed by the United States Treasury or GSE's are exempt from this concentration criterion.

Minimum Acceptable Credit Quality

As indicated in the table below, all corporate portfolio holdings at the time of purchase must have a minimum rating (*) by at least one of the Nationally Recognized Statistical Rating Organizations (NRSRO's).

	(i) S & P	(ii) Moody's
Short Term Rating	Not lower than the Town of Camp Verde current G.O. Bond Rating or its commensurate short term rating * (see exhibit 1)	Not lower than the Town of Camp Verde current G.O. Bond Rating or its commensurate short term rating * (see exhibit 1)
Long Term Rating	One grade higher than the Town of Camp Verde current G.O. Bond Rating *	One grade higher than the Town of Camp Verde current G.O. Bond Rating *

*In no case shall the rating be lower than that required by A.R.S. §35-323, as amended.

Safekeeping and Custody

Delivery vs. Payment - All trades of marketable securities will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in an eligible financial institution prior to the release of funds.

Safekeeping - Securities will be held by a custodian selected by the Town and evidenced by custodial reports. The safekeeping institution shall annually provide a copy of their most recent report on internal controls (Statement of Auditing Standards No. 70, or SAS 70).

IX. Reporting

The Finance Director shall produce for the governing body of the Town or their designee an investment report at least quarterly. The purpose of the report is to enable the Town to ascertain whether investment activities during the reporting period have conformed to the investment policy. The report should include:

- A list of individual securities held at the end of the reporting period;
- The realized and unrealized gains or losses in the portfolio;
- The duration of the portfolio and of each security held in the portfolio;
- The maturity date of each security held in the portfolio;
- The book value and market value of each security in the portfolio;
- The percentage of the total portfolio market value that each security represents;
- The yield to maturity of the portfolio and of each security held in the portfolio;
- The periodic interest earnings of each security held in the portfolio;
- The credit quality of each security held in the portfolio;
- A periodic summary of portfolio transactions, including fees incurred for external management and custody services.

Custodian Reconciliation – The report of investment holdings shall be reconciled within 30 days of the close of each month to the Finance Director's custodian bank. Discrepancies shall be reported to the Finance Director.

X. Ethics and Conflicts of Interest

Officers and employees involved in the investment process shall refrain from personal business activities that could conflict with the proper execution and management of the investment program or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose, within ten (10) days, any material interests in financial institutions with which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with which business is conducted on behalf of the Town.

XI. Policy Considerations

Exemption – Any investment currently held that does not meet the guidelines of this policy shall be exempted from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested only as provided by this policy.

Any deviation from the preceding policy shall require the prior specific written authority of the Town Council or Town Administration.

XII. Investment Training

Investment officials shall have a finance, accounting or related degree and knowledge of treasury functions. Investment training must take place not less than once in a two year period and receive no less than ten hours of instruction relating to investment

responsibilities from an independent source such as Government Finance Officers Association, Municipal Treasurers Association, American Institute of Certified Public Accountants, Government Finance Officers Association-Arizona, Arizona Society of Public Accounting or other professional organizations.

The Chief Financial Officer and all investment officials of the Town shall attend at least one training session relating to their cash management and investment responsibilities within 12 months of assuming these duties for the Town.

Training must include education in investment controls, security risks, strategy risks, market risks, and compliance with state investment statutes.

Guideline Glossary

U.S. Treasury Bills, Notes and Bonds: U.S. government guaranteed securities. Represent the most liquid and creditworthy security in the domestic market.

U.S. Federal Agency Securities: Debt obligations issued by agencies of the U.S. government such as the Federal National Mortgage Association (FNMA) and the Federal Farm Credit Bank (FFCB). While not explicitly guaranteed by the government, the securities are generally traded with an “implied” guarantee.

Collateralized Mortgage Obligations (CMO’s): Pass-through securities collateralized by residential mortgages for which prepayments are segmented to allow for more predictable cash flows. Issuers are primarily FNMA and FHLMC (Freddie Mac).

Repurchase Agreements: Standardized, simultaneous purchase and sale of the same security by approved brokers/dealers. Repurchase Agreements are, in effect, short-term (overnight) loans collateralized by securities. Two types of collateral are authorized: U.S. Treasury securities and U.S. Government Agency securities.

Commercial Paper: An unsecured promissory note (maturities 1-270 days) issued by banks, corporations, public entities and finance companies.

Corporate Notes and Bonds: Corporate debt instrument. Maturities range from nine months to 30 years.

Floating Rate Securities: Corporate or Federal Agency debt in which the periodic coupon is reset based upon a formula stated at the time of issue.

Municipal Obligations: Taxable or tax-exempt municipal securities typically secured by general governmental funds from tax revenue or a municipally operated enterprise.

Certificates of Deposit: A marketable receipt for funds deposited in a bank or thrift institution for a specific time period at a stated rate of interest.

Funds Maximum Maturity: The longest acceptable time to maturity that any one security in the portfolio may have at the time of purchase.

Maximum Maturity for Repurchase Agreements: The longest acceptable time to maturity that any one repurchase agreement in the portfolio may have at the time of purchase.

Portfolio Duration Target: Duration is the weighted average maturity of a portfolio’s cash flows, where the present values of the cash flows serve as the weights. Thus, portfolio duration target is a pre-determined duration at which a portfolio is expected to be maintained.

Portfolio Duration Range: An acceptable range in which the actual portfolio duration can deviate from the Portfolio Duration Target.

Prudence: The standard of prudence to be used by investment officials shall be the "prudent person" standard and shall be applied in the context of managing an overall portfolio. Investment officers acting in accordance with written procedures and this investment policy and exercising due diligence shall be relieved of personal responsibility for an individual security's credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and the liquidity and the sale of securities are carried out in accordance with the terms of this policy.

The "prudent person" standard states that, "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."
Source: GFOA Sample Investment Policy

Delegation of Authority: Authority to manage the investment program is granted to the Finance Director or his designee and derived from the following: A.R.S. §§35-321, 35-323. Responsibility for the operation of the investment program is hereby delegated to the investment officer, who shall act in accordance with established written procedures and internal controls for the operation of the investment program consistent with this investment policy. Procedures should include references to: safekeeping, delivery vs. payment, investment accounting, repurchase agreements, wire transfer agreements and collateral/depository agreements. No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the investment officer. The investment officer shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials. *Source: GFOA Sample Investment Policy*

Exhibit 1:

The relationship between long-term ratings and short-term ratings using Standard & Poor's rating convention is as follows:

Long-term Ratings

Short-term Ratings

