

CITY OF CHINO
STATEMENT OF INVESTMENT POLICY
(Updated for Certification)

1.0 POLICY:

This statement is intended to provide guidelines for the prudent investment of the temporarily idle cash of the City of Chino (City) and outline the policies for maximizing the efficiency of the City's cash management system. The ultimate goal is to enhance the economic status of the City, while protecting the investment corpus of pooled cash in accordance with applicable local, state, and federal laws.

2.0 SCOPE:

This investment policy applies to all financial assets and investment activities of the City, except for proceeds of debt issuance. Debt proceeds shall be invested in accordance with the "Permitted Investments" provisions for each specific bond indenture.

The Policy applies to the following funds and is accounted for in the City's annual audited financial statements.

- A. General Fund
- B. Special Revenue Funds
- C. Debt Service Funds
- D. Capital Improvement Funds
- E. Enterprise Funds
- F. Internal Service Funds
- G. Agency Funds

3.0 STANDARDS OF PRUDENCE:

The City Treasurer or Deputy City Treasurer authorized to make investment decisions on behalf of the City of Chino investing public funds pursuant to this policy are trustees and therefore fiduciaries subject to the prudent investor standard. When investing, reinvesting, purchasing, acquiring, exchanging, selling, and managing public funds, the City Treasurer or Deputy City Treasurer shall act with care, skill, prudence, and diligence under the circumstances then prevailing, that a prudent person acting in a like capacity and familiarity with those matters would use in the conduct of funds of a like character and with like aims, to

safeguard the principal and maintain the liquidity needs of the agency. Within the limitations of this section and considering individual investments as part of an overall strategy, the City Treasurer or a Deputy City Treasurer is authorized to acquire investments as authorized by law.

4.0 INVESTMENT OBJECTIVES:

When investing, reinvesting, purchasing, acquiring, exchanging, selling, and managing public funds, the primary objective of the City Treasurer or Deputy City Treasurer shall be to safeguard the principal of the funds under its control. The secondary objective shall be to meet the liquidity needs of the City. The third objective shall be to achieve a market average rate of return consistent with the primary objectives of safety and liquidity, throughout budgetary and economic cycles. At no time should safety or liquidity be compromised in exchange for higher yields.

1. Safety: The preservation of invested capital is of primary importance. The City Treasurer or a Deputy City Treasurer shall only invest in investments that are considered safe. The safety and risk associated with an investment refers to the potential loss of principal, accrued interest, or a combination of these amounts. Each investment decision shall seek to ensure that capital losses are avoided.

2. Liquidity: The City's investment portfolio shall contain investments with a diversified mix of maturities in order to provide sufficient liquidity to meet projected operating cash requirements of the City.

3. Return on Investments: The City's investment portfolio shall be designed with the objective of obtaining a reasonable and competitive market rate of return taking into consideration risk constraints, prudent investment principles, and the cash flow characteristics of the portfolio.

5.0 AUTHORITY:

The authority to invest City funds is vested in the City Treasurer and any duly appointed deputy in accordance with Resolution No. 1288 of the City Council of the City of Chino. All investment decisions and investment of funds shall be made in full compliance with this policy, the California Government Code Sections 53600 et. seq., and all other relevant state and federal requirements as well as any amendments or additions to such requirements.

Management responsibility for the investment of City funds is vested in the City Treasurer who shall prepare written procedures for the operation of the investment program and safekeeping of investment instruments consistent with this investment policy. The written procedures may provide for the delegation of authority to a Deputy City Treasurer who, upon assuming such office, shall become responsible for investment transactions. No person may engage in an investment decision except as permitted by this policy and by the procedures promulgated by the City Treasurer. Prior to implementing such procedures, the City Treasurer shall submit them to the City Council for approval.

The Investment Advisory Committee is hereby established and it is vested with the authority to oversee the implementation of this policy and to recommend amendments of this policy to the City Council. The Committee is composed of two City Council Members, the City Manager, the City Treasurer, the Deputy City Treasurer, and one alternate City Council Member who shall serve only in the absence of the regular City Council Members. The Committee shall meet once every quarter and at such other times as may be called by the City Treasurer or either City Council Member. The City Treasurer shall be the chair of the Committee. The Committee may recommend the employment of a qualified investment advisor whose employment shall be determined by the City Council. The investment advisor shall advise the City Treasurer, the Committee and the City Council.

6.0 ETHICS AND CONFLICTS OF INTEREST:

Elected officials and employees of the City involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair their ability to make impartial decisions under the Political Reform Act and Government Code Section 1090 *et seq.* Elected officials and employees shall disclose to the City Manager any material interests in financial institutions that conduct business with the City, and they shall further disclose any personal investment position or financial asset that could be related to the performance of the City's investment program. Elected officials and employees shall subordinate their personal investment transactions to those of the City particularly with regard to the time of purchases and sales.

Any firm proposing to provide any type of investment service to the City shall acknowledge their familiarity with the provisions of the Political Reform Act, Government Code Section 81000 *et seq.* and CA Code of Regulations 18110 *et seq.* and the provisions limiting contractual conflicts of interest under Government Code Section 1090 *et seq.* Any firm proposing to provide any type of investment service to

the City shall also acknowledge their familiarity with and agree to abide by any Federal or State law, regulation, rule or policy pertaining to or limiting campaign contributions by such firms, their employees, spouses or agents.

All persons, firms, broker/dealers, financial institutions and advisors providing investment services or bond issue assistance shall disclose to the City Manager and the Treasurer all fee sharing, fee-splitting and commission arrangements with other entities or persons prior to the City agreeing to buy an investment or issue bonds.

7.0 AUTHORIZED FINANCIAL DEALERS AND INSTITUTIONS:

The City Treasurer shall select all security dealers and depositories subject to City Council approval. The City shall conduct its investment transactions with several competing, reputable security broker/dealers. The selection process shall focus on financial viability, knowledge, experience, and ethics in the fixed-income securities industry. The City Treasurer will maintain a list and a written agreement with financial institutions authorized to provide investment services subject to City Council approval.

All financial institutions and broker/dealers who desire to become qualified bidders for investment transactions must supply the City Treasurer with the following: audited financial statements, proof of National Association of Security Dealers certification, proof of state registration, completed broker/dealer questionnaire, and certification of having read the City's investment policy and depository contracts. The City Treasurer will conduct an annual review of the financial condition and registrations of qualified bidders.

8.0 AUTHORIZED AND SUITABLE INVESTMENTS:

Authorized and suitable investments shall mean and include any of the following securities to the extent the same are permitted by applicable federal and state code:

Direct Obligations of the United States of America, specifically U.S. Treasury bills and notes.

Direct Obligations of the U.S. Government Agencies, guaranteed directly or indirectly by the United States government and/or directly or indirectly by any of the following: Banks for Cooperatives, Federal Intermediate Credit Banks, Federal Home Loan Bank System, Export-Import Bank of the United States, Federal Financing Banks, Federal Land Banks, Federal Farm Credit Bank, Government

National Mortgage Association, Farmers Home Administration, Federal Home Loan Mortgage Corporation, Federal National Mortgage Association, Federal Housing Administration, Tennessee Valley Authority, Student Loan Marketing Association, and the Resolution Funding Corporation.

Certificates of Deposit which are federally insured or fully collateralized by permitted investments as defined herein; issued by institutions which are either a nationally or state chartered bank, or thrift, or savings and loan.

Guaranteed Investment Contracts that meet the requirements of City / Successor Agency bond Official Statements may be utilized for the investment of those specific bond proceeds.

Banker's Acceptances which are issued by banks with a rating of "A" or higher by Standard and Poor's or Moody's at the time of investment, and do not exceed 180 days maturity.

Repurchase Agreements with any federally insured state or national bank of primary government bond dealer on the Federal Reserve reporting dealer list. All repurchase agreements must be covered by a master repurchase agreement. The term of such repurchase agreement may not exceed two weeks. The repurchase agreement must be 102% collateralized by U.S. Treasury securities that are free and clear of any third-party lien or claim. The collateral must be delivered to the custodian or third party acting as agent for the City.

Investment Pools including 1) Local Agency Investment Fund (State Pool) managed by the State of California, 2) **Los Angeles County Pool**, managed by the County of Los Angeles, and 3) **Investment Trust of California (CalTrust)**, managed by Metropolitan West through a partnership between the California State Association of Counties and the League of California Cities.

Government Securities Money Market Fund(s) which invest only in U.S. Government Securities, and the net asset value is stabilized at one dollar. The fund shall have the highest ranking or the highest letter and numerical rating by not less than two of the three largest nationally recognized rating services.

Passbook Savings Account Demand Deposits in a nationally or state-chartered bank or federal savings and loan association in the State of California, fully insured by the Federal Deposit Insurance Corporation or the Federal Savings & Loan Insurance Corporation.

Sweep Accounts in a banking institution at which the City currently does business may be utilized for the temporary placement of funds. Such placement of funds is intended to be for a temporary period, not to exceed seven days. It is acknowledged that the individual investment instruments which comprise said sweep accounts may or may not conform to the City’s Statement of Investment Policy.

Specifically excluded as investments are: reverse repurchase agreements; longer-term U.S. Treasury, Agency, and corporate bonds with maturities exceeding five years; mortgage-backed securities; leveraged investments; derivatives of any kind at any time; and other investments not permitted under applicable government codes.

9.0 DIVERSIFICATION OF INVESTMENTS:

It is the City's policy to minimize portfolio risk by diversifying maturity, sector, and class allocations. Default risk shall be minimized by investing in an assortment of permitted investments as mentioned above. To minimize overall portfolio risk, the following not-to-exceed diversification goals shall guide the City's operating fund portfolio, based upon the portfolio structure at the time of purchase. Percentage limitations stated below will be calculated and applied at the time of purchase of the investment instrument.

<u>Investment Type</u>	<u>Not-To-Exceed Limit</u>	<u>Other Restrictions</u>
U.S. Treasury Obligations Notes and Bills	No limit	None
Direct Obligations of U.S. Federal Agencies	50%	Maximum of 40% of investment portfolio in any one agency.

<u>Investment Type</u>	<u>Not-To-Exceed Limit</u>	<u>Other Restrictions</u>
Certificates of Deposit	20%	The maximum amount with any one institution may not exceed \$250,000, unless the institution fully collateralizes the deposit pursuant to Government Code Section 53652 and related statutes, in which case the maximum amount with any one institution may not exceed \$5 million
Bankers Acceptances	10%	The maximum amount with any one issuer may not exceed \$2 million.
Repurchase Agreements	10%	Not to exceed \$5 million per dealer. Mark to market at 102%.
Local Agency Investment Fund	\$50 Million	Limitations are established by the State Treasurer and revised periodically. Current limit is \$50 million.
Los Angeles County Pool	\$45 Million	None
Investment Trust of California (CalTrust)	\$50 Million	None

<u>Investment Type</u>	<u>Not-To-Exceed Limit</u>	<u>Other Restrictions</u>
Government Securities Money Market Fund	10%	The maximum amount with any one diversified management company is \$2 million.
Demand Deposits	no limit	FDIC insured institutions.
Guaranteed Investment Contracts	no limit	Can be utilized only for investment of bond proceeds and only as directed by the Official Statement of bond issuance.

10.0 INVESTMENT POOLS:

Government sponsored investment pools (Pools) are permitted under California Government Code Section 53601 *et seq.* and an excellent short-term investment option for cash management facilities. These pools can provide safety, liquidity, and yield in a single diversified investment. However, thoughtful investigation and due diligence are required, both initially at time of purchase, and ongoing analysis to determine that the investment pool is being managed in a manner consistent with the objective of the Policy. The following guidelines include, but are not limited to:

- A) Shall have attained the highest ranking or the highest letter and numerical rating provided by not less than two nationally recognized statistical rating organizations.
- B) The Pools mark to market weekly at a minimum.
- C) The Pool provides comprehensive, timely monthly reports which include detailed transaction listings, reports realized and unrealized gains and losses, provides accurate market values for each security, provides quality rating for individual securities, takes delivery DVP, provides third party safekeeping of all investments, and for whom an audit is conducted annually by an independent auditor with no relationship to the Pool.

11.0 MONEY MARKET MUTUAL FUNDS

Money market mutual funds provide another safe, liquid and diversified investment option for the City's surplus capital: however, certain conditions need to be met both initially and on an ongoing basis. The money market may only invest in US Government securities permitted under this policy and under California Government Code Section 53601 *et seq.* with final stated maturities of one year or less "Government Money Market Funds."

In order to be an eligible money market investment under this section, the primary objective of the money market, as stated in the fund's prospectus, is to maintain a constant \$1.00 Net Asset Value (NAV). The following additional guidelines include, but are not limited to:

- A) Only invests in US Government securities, and the weighted average maturity of the portfolio is less than 180 days.
- B) The fund shall be registered with the SEC.
- C) The fund shall have a minimum of \$500 million in total asset size of portfolio at time of investment, and should not drop below this threshold.
- D) The money market shall have attained the highest ranking or the highest letter and numerical rating provided by not less than two nationally recognized statistical rating organizations, and shall maintain these ratings for the duration of the investment.

12.0 COLLATERALIZATION:

All demand deposits, time deposits and repurchase agreements are to be fully collateralized with securities authorized by the California Government Code and the City.

The eligible collateral for repurchase agreements must be those investments authorized by Section 53651 of the California Government Code. The Treasurer may specify the type of eligible collateral for use in repurchase agreements. Eligible collateral must be in book entry form. Collateral is valued at current market plus accrued interest through the date of valuation.

A) The cost value (book value) of collateral pledged for demand deposits must at all time be equal to or greater than the amount on deposit, plus accrued interest, in accordance with the following ratio:

U.S. Treasury Securities	110%
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B) The cost value (book value) of collateral pledged for repurchase agreements must at all time be equal to or greater than the par amount, plus accrued interest, with the following ratios:

U.s. Treasury Securities	102%
U.S. Government Agencies	102%
Cash (in immediately available funds)	100%

It is the policy of the City to require reports at least on a quarterly basis from institutions with which the Treasurer has pledged security interest. The Treasurer shall monitor the adequacy of collateralization to ensure that balances are collateralized in accordance with the ratios approved herein.

With regard to repurchase agreements, it is the policy of the City to initiate a margin call in the event pledged collateral falls below the appropriate ratio.

Collateralized investments and deposits often require substitution of collateral. Any broker or financial institution requesting substitution must contact the City for approval in the event the counterparty to the transaction is not authorized under agreement with the City to make substitutions.

13.0 SAFEKEEPING AND CUSTODY:

The City Treasurer shall take possession of all of the City's investment securities pursuant to Government Code Section 53601 which, in pertinent part, provides as follows:

“A local agency purchasing or obtaining any securities prescribed in this section, in a negotiable, bearer, registered, or nonregistered format, shall require delivery of the securities to the local agency, including those purchased for the agency by financial advisors, consultants, or managers using the agency's funds, by book entry, physical delivery, or by third party custodial agreement. The

transfer of securities to the counterpart bank's customer book entry account may be used for book entry delivery. For purposes of this section "counterparty" means the other party to the transaction. A counterparty bank's trust department or separate safekeeping department may be used for the physical delivery of the security if the security is held in the name of the local agency."

14.0 MAXIMUM MATURITIES:

The average dollar weighted maturity of the total portfolio shall not exceed 2 years. No investment shall have a maturity date in excess of 5 years from date of purchase without approval of the City Council prior to any such transactions. No more than 35% of the total portfolio shall be invested in instruments with maturities beyond 3 years at the time of purchase, and no more than 20% of the total portfolio shall be invested in instruments with maturities beyond 4 years at the time of purchase. Maturities shall be staggered to minimize liquidity risk and to enhance the stability of incoming cashflows. At least 10% of the portfolio shall be invested in instruments which can be liquidated on one day's notice.

15.0 INTERNAL CONTROL:

The City Treasurer and Fiscal Services Manager shall establish procedures that separate the internal responsibility for management and accounting of the investment portfolio. An analysis by an external independent auditor shall be conducted annually to review internal controls, account activity and compliance with policies and procedures.

16.0 PERFORMANCE STANDARDS AND EVALUATION:

Investment performance is continually monitored and evaluated by the City Treasurer. Investment portfolio reports are generated on a monthly basis and submitted to the City Manager and the Investment Advisory Committee. The investment portfolio reports are to be submitted within 30 days of the end of the reporting period.

The weighted average maturity of the pooled portfolio shall not exceed two years and shall be designed to attain a market average rate of return comparable to the average one year U.S. Constant Maturity Treasury (CMT).

An annual audit of the City's Investment Policy, practices, procedures and portfolio status will be conducted by an independent auditor. The auditor will provide the City Manager and City Council with written observations and recommendations regarding the adequacy of investment controls.

17.0 REPORTING:

The City Treasurer shall provide the City Council with monthly reports about the City's investments. These reports shall include, at a minimum, the following information for each type of investment held in the City's investment portfolio: the issuer; date of purchase; date of maturity; amount of investment; current market value; yield on investment; yield and total return on portfolio; income generated from investments; and a description of unusual investment activity or developments during the month for which the report is prepared.

The City Treasurer shall prepare such a report for each month. The City Treasurer shall deliver each monthly report to the Mayor and each City Council Member no later than thirty (30) calendar days after the close of the month for which each report is prepared.

In the event that an investment advisor is retained by the City Council, the investment advisor shall prepare and deliver a report for each month's investment activity as required herein to the City Treasurer in such time as to allow the City Treasurer to comply with the delivery times for each report required by this policy.

The City Treasurer may be relieved from that office in the event of any failure to comply with the reporting requirements of this policy.

18.0 INVESTMENT POLICY ADOPTION:

The City's investment policy shall be adopted annually by resolution by the City Council. The policy shall be reviewed annually by the City Treasurer and the City Council and any modifications made thereto shall be approved by the City Council.

GLOSSARY:

AGENCIES – Agencies of the Federal government set up to supply credit to various classes of institutions (e.g., S&L's, small business firms, students, farmers, housing agencies, etc.) Examples include Federal Home Loan Mortgage Corporation (FHLMC), Federal National Mortgage Association (FNMA), Federal Home Loan Bank (FHLB) and Federal Farm Credit Bank (FFCB).

ASK/OFFER – The price at which securities are offered. (The price at which a firm will sell a security to an investor.)

BANKERS' ACCEPTANCE (BA) – A draft or bill of exchange accepted by a bank or trust company. The accepting institution guarantees payment of the bill as well as the issuer.

BASIS POINT – One one-hundredth of a percent (i.e., 0.01%).

BEAR MARKET – A period of generally pessimistic attitudes and declining market prices.

BID PRICE – The price at which a broker/dealer will buy securities from an investor.

BOND EQUIVALENT YIELD – The basis on which yields on notes and bonds are quoted.

BOOK VALUE (COST VALUE) – The purchase price of the security as recorded on the City's books.

BROKER/DEALER – An individual or firm acting as principal in a securities transaction.

BULL MARKET – A period of generally optimistic attitudes and increasing market prices.

CALLABLES – Securities that the issuer has the right to redeem prior to maturity.

CERTIFICATE OF DEPOSIT (CD) – A time deposit with a specific maturity evidenced by a certificate. Large denomination CD's are typically negotiable.

CMT – Constant Maturity Treasury – An index of the average yield on United States Treasury securities adjusted to a constant maturity.

COLLATERAL – Securities, evidence of deposit or other property which a borrower pledges to secure repayment of a loan. Also refers to securities pledged by a bank to secure deposits of public monies.

COMPREHENSIVE ANNUAL FINANCIAL REPORT (CAFR) – The official annual report of the City. It includes five combined statements for each individual fund and account group prepared in conformity with Generally Accepted Accounting Principles (GAAP). It also includes supporting schedules necessary to demonstrate compliance with finance-related legal and contractual provisions, extensive introductory material, and a detailed Statistical Section.

CORPORATE MEDIUM TERM NOTE – A security issued by a corporation doing business in the U.S. with a maturity not to exceed five years.

COST VALUE (BOOK VALUE) – The purchase price of the security as recorded on the City's books.

COUPON – a) The annual rate of interest that a bond's issuer promises to pay the bondholder on the bond's face value; b) a certificate attached to a bond evidencing interest due on a payment date.

DEBENTURE – A bond secured only by the general credit of the issuer.

DELIVERY VS. PAYMENT – Delivery of securities with a simultaneous exchange of money.

DEMAND ACCOUNT – An account with a commercial bank from which check withdrawals may be made at any time.

DERIVATIVES – Financial products that are dependent for their value on (or derived from) an underlying financial instrument, a commodity, or an index representing values of groups of such instruments or assets.

DISCOUNT – The difference between the cost price of a security and its maturity when quoted at lower than face value. A security selling below original price shortly after sale also is considered to be at a discount.

DIVERSIFICATION – Dividing investment funds among a variety of securities offering independent returns.

FEDERAL FUNDS RATE – Interest rate charged by one institution lending federal funds to another.

FEDERAL OPEN MARKET COMMITTEE (FOMC) – Consists of seven members of the Federal Reserve Board and five of the twelve Federal Reserve Bank Presidents. The President of the New York Federal Reserve Bank is a permanent member, while the other presidents serve on a rotating basis. The Committee periodically meets to set Federal Reserve guidelines regarding purchases and sales of Government Securities in the open market as a means of influencing the volume of bank credit and money.

FINANCIAL ADVISOR – A firm or bank that acts in a financial advisory capacity with respect to a new issue of municipal securities pursuant to a written contract.

FISCAL AGENT – A financial institution with trust powers which acts in a fiduciary capacity for the benefit of the bondholders in enforcing the terms of the bond contract.

GOVERNMENTAL ACCOUNTING STANDARDS BOARD – The independent organization that establishes and improves standards of accounting and financial reporting for U.S. state and local governments.

INTERNAL RATE OF RETURN – Rate of return over the life of a security on variables.

LOCAL AGENCY INVESTMENT FUND (LAIF) – The aggregate of all funds from political subdivisions that are placed in the custody of the State Treasurer for investment and reinvestment.

MARKET VALUE – The price at which a security is trading, usually the liquidation value.

MASTER REPURCHASE AGREEMENT – A written contract covering all future transactions between the parties to repurchase-reverse, repurchase agreements that establishes each party's rights in the transactions. A master agreement will often specify, among other things, the right of the buyer-lender to liquidate the underlying securities in the event of default by the seller borrower.

MONEY MARKET MUTUAL FUNDS – Open-ended mutual fund that invests in commercial paper, banker's acceptances, repurchase agreements, government securities, certificates of deposit and other highly liquid and safe securities, and pays money market rates of interest. The fund's net asset value remains a constant \$1 share, with the interest rate increasing or decreasing.

NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION (NRSRO) – A rating organization designated by the SEC as being nationally recognized.

OFFER PRICE – The price at which a broker/dealer will offer securities to an investor.

OPEN MARKET OPERATIONS – Federal Reserve activity. Under the Federal Reserve Act, the Fed uses purchases and sales of Government and Federal Agency securities to add to or subtract from commercial bank reserves. Goals are to sustain economic growth, high employment and reasonable price stability.

PAPER GAIN OR LOSS Term used for unrealized gain or loss on securities being held in a portfolio based on comparison of current market quotes and their original cost. This situation exists as long as the security is held while there is a difference between cost value (book value) and the market value.

PORTFOLIO – Collection of securities held by an investor.

PRIMARY DEALER – A group of government securities dealers that serve as trading counterparties of the New York Fed in its implementation of monetary policy. This role includes the obligations to: (i) participate consistently in open market operations to carry out U.S. monetary policy pursuant to the direction of the Federal Open Market Committee (FOMC); and, (ii) provide the New York Fed's trading desk with market information and analysis helpful in the formulation and implementation of monetary policy. Primary dealers are also required to participate in all auctions of U.S. government debt and to make reasonable markets for the New York Fed when it transacts on behalf of its foreign official account holders.

RATE OF RETURN – The yield obtainable on a security based, on its purchase price or its current market price. This may be the amortized yield to maturity; on a bond, the current income return.

REPURCHASE AGREEMENT (REPO) – A holder of securities sells these securities to an investor with an agreement to repurchase them at a fixed price on a fixed date. The security “buyer” in effect lends the “seller” money for the period of the agreement, and the terms of the agreement are structured to compensate them for this.

REVERSE REPURCHASE AGREEMENT (REVERSE REPO) – A reverse-repurchase agreement (reverse repo) involves an investor borrowing cash from a financial institution in exchange for securities. The investor agrees to repurchase the securities at a specific date for the same cash value plus an agreed upon interest rate. Although the transaction is similar to repo, the purpose of entering into a reverse repo is quite different. While a repo is a straightforward investment of public funds, the reverse repo is a borrowing.

SAFEKEEPING – The service provided by banks and trust companies for clients when the bank or trust company stores the securities, takes in coupon payments, and redeems issues at maturity.

SECURITIES & EXCHANGE COMMISSION (SEC) – Agency created by Congress to protect investors in securities transactions by administering securities legislation.

SEC RULE 15(C)3-1 – See Uniform Net Capital Rule.