Deschutes County Investment Advisory Committee

Semi-Annual Meeting October 14, 2025, 11:30am – 1:00pm, In-Person

Location – Deschutes County Administration Building, 2nd Floor Allen Room

Topic: Investment Advisory Committee

Time: October 14, 2025 11:30 PM Pacific Time (US and Canada)

Join Zoom Meeting

https://us02web.zoom.us/j/83945113906

Meeting ID: 839 4511 3906

One tap mobile

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+16694449171,,83945113906# US

By phone: 1-253-215-8782 US

<u>Committee Purpose:</u> The committee will meet with the County Treasurer at least twice per year and review the investment portfolio with regards to compliance with the adopted investment policy. The committee will make recommendations to policy changes and possible investment procedures.

Members:

Eric Berlin – Director, AJ Gallagher & Co.
Craig Renkert – Retired CFO, Federal Metals Credit Union
James Wood – Accounting Manager, City of Redmond
Richard Ambrose – Principal, Axia Wealth Management

County Staff:

Patti Adair – Deschutes County Commissioner Nick Lelack – Deschutes County Administrator Bill Kuhn – Deschutes County Treasurer Robert Tintle – Deschutes County CFO Angie Powers – Administrative Assistant

Agenda

- 1. Call to Order
- 2. Introductions/Notices

- 3. Review/Approve minutes from April 17, 2025 meeting
- 4. Treasurer's Report
- 5. Investment Policy Discussion
- 6. Other Considerations -
- 7. Market Discussion
- 8. Next Steps/Updates
 - a. Update on Investment Policy Statement
 - b. Annual review of Investment Broker/Dealer authorization update
- 9. Other Discussion Items
- 10. Adjourn



Deschutes County encourages persons with disabilities to participate in all programs and activities. This event/location is accessible to people with disabilities. If you need accommodations to make participation possible, please call (541) 388-6584 or send email to erik.kropp@deschutes.org.

Condado de Deschutes alienta a las personas cualificadas con discapacidad a participar en sus programas y actividades. Esta evento/ubicación es accesible para personas con discapacidad. Si necesita hacer arreglos para hacer posible la participación, llame al (541) 388-6584 o envié un correo electrónico a erik.kropp@deschutes.org.



MEMORANDUM

DATE: September 22, 2025

TO: **Board of County Commissioners**

FROM: Bill Kuhn, Treasurer

SUBJECT: Treasury Report for August 2025

Following is the unaudited monthly treasury report for fiscal year to date (YTD) as of August 31, 2025.

Treasury and Investments

- The portfolio balance at the end of August was \$302.4 million, a decrease of \$4 million from July and an increase of \$20.4 million from last year (August 2024).
- Net investment income for August was \$1,023.4K, approximately \$7k lower than last month and \$212.8k greater than August 2024. YTD earnings of \$2,053.6K are \$418.9K more than the YTD earnings last year.
- All portfolio category balances are within policy limits.
- The LGIP interest rate remained at 4.60% during the month of August. The FIB rate was 4.25%. Benchmark returns for 24-month treasuries were down 3 basis points and 36-month treasuries were down 4 basis points from the prior month.

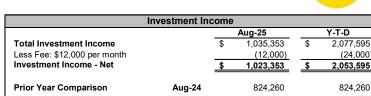
Maturity (Years)

1.11

- The average portfolio yield increased to 4.22%, which was up 21 bps from last month's average %.
- The portfolio weighted average time to maturity was 1.11 years.

Deschutes County

8/31/2025



Portfolio Breakdown: Par Value by Investment Type								
Municipal Debt		22,530,000	7.5%					
Corporate Notes		15,000,000	5.0%					
		-	0.0%					
U.S. Treasuries		150,000,000	49.6%					
Federal Agencies		62,000,000	20.5%					
LGIP		35,844,195	11.9%					
First Interstate (Book Balance)		16,993,874	5.6%					
Total Investments	\$	302,368,068	100.0%					

[Total Portfolio: By Investment Type
	First Interstate Bank 5.6% Municipal Debt 7.5% Corporate Notes 5.0%
LGIP 11.9%	Time Certificates 0.0%
Federal Agencies 20.5%	U. S. Treasuries 49.6%

			Po	rtfolio b	y Brok	er		
w	\$80						# E0.0	\$72.5
Millions	\$60						\$59.9	
Ξ	\$40			604 E	\$33.7	\$38.2		
	\$20	\$7.3	\$16.5	\$21.5				
	\$-	Moreton Capital Markets	Robert W Baird & Co	DA Davidson	Stifel Capital	Piper Sandler	Great Pacific Securities	Castle Oak

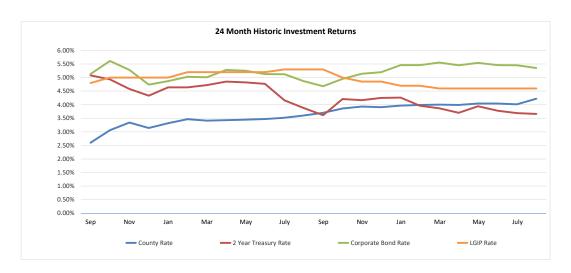
Category Maxim	ums:		Yield Percentages	
U.S. Treasuries	100%		Current Month	Prior Month
LGIP (\$61,749,000)	100%	LGIP	4.60%	4.60%
Federal Agencies	100%	Investments	4.16%	3.91%
Banker's Acceptances	25%	Average	4.22%	4.01%
Time Certificates	50%			
Municipal Dobt	25%		Ronchmarke	

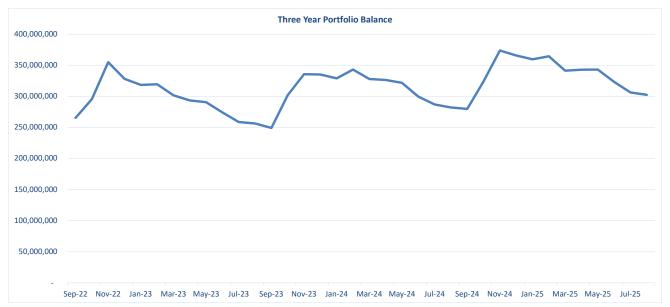
l Debt	25%	Benchmarks	
e Debt	25%	24 Month Treasury 3.66%	3.69%
		LGIP Rate 4.60%	4.60%
aturity (Yea	ırs)	36 Month Treasury 3.63%	3.67%
Weighted A	Average		-

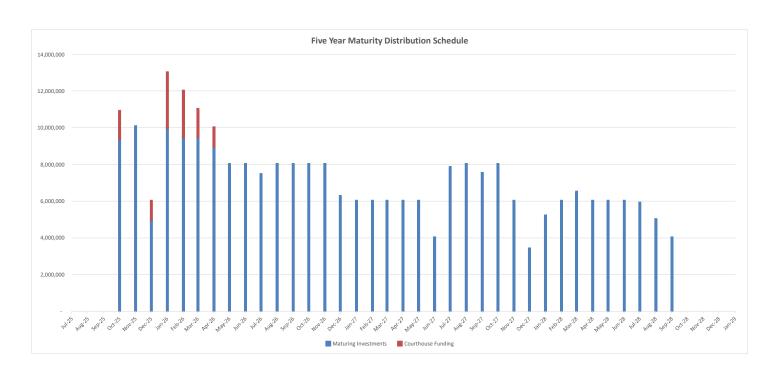
Term	Minimum	Actual		
0 to 30 Days	10%	20.6%		
Under 1 Year	25%	51.8%		
Under 5 Years	100%	100.0%		

Other	Policy	Actual
Corp Issuer	5%	3.0%
Callable	25%	9.8%
Weighted Ave.	AA2	AA1

Investment Activ	rity	
Purchases in Month	\$	14,000,000
Sales/Redemptions in Month	\$	18,850,000







Deschutes County Investments Portfolio Management Portfolio Details - Investments August 31, 2025

11047 FAC 3130B2Y33 Federal Home Loan Bank DA DAV 101/E2022 654 AA1 AA+ 4.125 4.28 2.000.000 1.995.535 1.994.810 91/72025 1.10130 FAC 3130B32T9 Federal Home Loan Mig Corp DA DAV 101/E2022 101/E2022 1.700 AA1 AA+ 4.40 1.000.000 995.959 991.767 1.10133 FAC 3134HATD5 Federal Home Loan Mig Corp GPAC 101/E2022 1.000 1.10220227 751 AA1 AA+ 4.50 4.100.000 395.959 991.767 1.10133 FAC 3133ETR34 Federal Farm Credit Bank GPAC 111/E2025 111/E20						Purchase	Maturity	Days To	Ratings	;	Coupon		Par	Market	Book	Call
1994 FAC 3177EADD 1995									Moodys							Date
1988 A.C.																
1965 FAC \$15828DMB Februal Horse Loss Back GPAC 1960204 1960205 50 Act 4.12 4.00 2.000,000 1969.45 1,969.552 - 1,9										AA+						
1995 FAC 31456VVV Federal Frame Loan May Corp CASTLE 78,0022 10,220205 51 AA1 A.4 0.55 3.20 2,000,000 1,989,685 1,989,180																
1978 AC 3159CA29 Federal National May Asian			3130B3DN0	Federal Home Loan Bank												
1976 AC 31950003 Federal Hattorial Mig Asam CASILE I1/12/2020 11/12/2020 11/13/2025 17/14/AN AA 407 40/14 10/14/AN																
1988 FAC 313SEPCST Fedoral Fam Crodil Bank FS 12890223 11152025 12890255 1389040 1.000,000 1				0												
1906 FAC 3133EPFR] Federal Ferm Crossil Bank R.W. 8 11190023 1282025 68 A.H. A.H. 4.05 4.50 2.000,000 2.001,886 2.000,048																
1994 FAC 31930AWM Federal Home Lean Bank R.W. B. 11/10/2003 191/20/2005 10/20/2005 133 AA1 AA4 4.75 4.95 2,000,000 2,003,248 1,989,044														, ,		
11105 FAC \$1335MMRD Federal Farm Credit Bank DA DAV \$1172026 \$173 JAA1 AA+ 0.47 4.25 2.500,000 2.469,848 2.468,383																
11100 FAC 3139ALPGP Proferal Horne Loan Bank DA DAW 0111/2025 2026/2026 179 AA1 AA+																
11106 AC 3130ABS														, ,		
19972 AC 3730A337																
1907 FAC 31304PN5 Federal Home Loan Bank RW B 12/19/2023 31302026 199 AA1 AA4 0.875 4.39 2.000,000 1967,191 1.964,066																9/10/2025
19975 FAC 3133EPPR0 Federal Farm Credit Bank GPAC 1117/2023 41/09/2026 221 AA1 AA4 4.625 4.77 2.000.000 2.007.286 1.996.318		-										-				
19975 FAC 3135EPPN0 Federal Harma Credit Bank CPAC 11222023 3470206 221 AA1 AA+ 4.625 4.81 2,000,000 2,007.288 1.997.881																
19076 FAC 3130AAJA3 Federal Horne Lone Bank PS 11/22/2023 825/2026 858 AA1 AA+ 2.4 4.59 2,000,000 1,907.989 1,952/208 11/05/2025 11/05/2025 13/05/2035																
19987 FAC 3135EMVV1 Federal Farm Credit Bank PS 12/12/2023 91/20208 395 AA1 AA+ 2.4 4.59 2,000,000 1,370,591 1,396,258																
1954 FAC 3134WCCS Federal Home Loam Mg Corp PS 111/5/2024 1028/2026 422 AA1 AA				Federal Home Loan Bank				358 AA1		AA+	0.7		2,000,000			11/25/2025
FAC 3190ALXH Federal Home Lonn Bank DA DAV 11/2/2024 21/17/2027 534 AA1 AA+ 0.85 2.000,000 1.916,482 1.903.873 11/17/2025 11/12/202			3133EHWV1	Federal Farm Credit Bank		12/12/2023	9/1/2026	365 AA1		AA+	2.4		2,000,000	1,970,591	1,959,256	
FAC 3190ALSAB Federal Home Loss Bank STIFEL 32/1/2024 226/2027 543 AA1 AA+ 0.9 4.57 2,000,000 1,916,294 1,988,937 1,1025 1,000 1,916,294 1,988,937 1,000 1,916,294 1,988,937 1,000 1,916,294 1,988,937 1,000				Federal Home Loan Mtg Corp									2,000,000		1,922,888	10/28/2025
11024 FAC 3130AVBC5 Federal Home Loan Bank PS 4/29/2024 31/22/2027 557 AA1 AA+ 4.5 4.87 2.000,000 2.031.571 1.997.466				Federal Home Loan Bank												
11024 FAC 3142WHOQ Federal Agriculture Mig Corp PS 4/29/2024 4/16/2027 592 A. B. 4.88 2.000,000 2.031.571 1.997.456				Federal Home Loan Bank												11/26/2025
11047 FAC 3130B2Y33 Federal Home Loan Bank DA DAV 101/E2022 654 AA1 AA+ 4.125 4.28 2.000.000 1.995.535 1.994.810 91/72025 1.10130 FAC 3130B32T9 Federal Home Loan Mig Corp DA DAV 101/E2022 101/E2022 1.700 AA1 AA+ 4.40 1.000.000 995.959 991.767 1.10133 FAC 3134HATD5 Federal Home Loan Mig Corp GPAC 101/E2022 1.000 1.10220227 751 AA1 AA+ 4.50 4.100.000 395.959 991.767 1.10133 FAC 3133ETR34 Federal Farm Credit Bank GPAC 111/E2025 111/E20		-	3130AVBC5	Federal Home Loan Bank	PS		3/12/2027	557 AA1		AA+	4.5	4.87	2,000,000	2,022,409	1,989,375	
FACC 31308279 Federal Home Loan Bank DA DAV 101/2025 101/2027 760 AA1 AA+ 3.75 A.16 1,000,000 999,179 1,000,000 101/2025 11033 FACC 31344HDT6 Federal Home Loan Mig Corp DA DAV 101/2025 101/2027 781 AA1 AA+ 3.75 A.16 1,000,000 999,199 991,767 7.01 781 AA1 AA+ 3.75 A.16 1,000,000 999,199 991,767 7.01 78	11024		31424WHG0	Federal Agriculture Mtg Corp	PS	4/29/2024	4/16/2027	592			4.8	4.88	2,000,000	2,031,571	1,997,456	
11041 FAC 3134HATDS Federal Home Loan Mig Corp GPAC 104/2024 11/26/2027 781 AA1 AA+ 3.75 A.16 1,000,000 995,99 991,767 - 1,000,000		_	3130B2Y33	Federal Home Loan Bank			6/17/2027			AA+	4.125		2,000,000			
FACE 11403YF Federal Home Loam Mig Corp GPAC 1014/2024 11428/2025 816 AA1 A. 4.25 4.31 2.000,000 941,463 944,091 1128/2025 111195 FAC 3133ETMCB Federal Farm Credit Bank GPAC 1172025 1141/2028 865 AA1 A. 4.25 4.31 2.000,000 3.018,717 3.012,011 11119 FAC 3133ETMCF Federal Farm Credit Bank DA DAV 1172025 4/28/2028 970 AA1 A. 4.14 4.39 1.000,000 942,910 926,699 11110 FAC 3133ETMCF Federal Farm Credit Bank DA DAV 1172025 4/28/2028 970 AA1 A. 4.14 4.39 1.000,000 942,910 926,699 11111 FAC 3133ETMCF Federal Farm Credit Bank PS 7/23/2025 7/3/2028 1036 Aa1 AA 3.75 3.77 2.000,000 2.007,895 1.999,901 1.000,000 1.000,	11030	FAC	3130B32T9	Federal Home Loan Bank	DA DAV	10/4/2024	10/1/2027	760 AA1		AA+	4	4.00	1,000,000	999,179	1,000,000	10/1/2025
111195 FAC	11041	FAC	3134HATD5	Federal Home Loan Mtg Corp	DA DAV	10/25/2024	10/22/2027	781 AA1		AA+	3.75	4.16	1,000,000	995,959	991,767	
11115 FAC	11033	FAC	3134GVYY8	Federal Home Loan Mtg Corp	GPAC	10/4/2024	11/26/2027	816 AA1				3.65	1,000,000	941,463	944,091	11/26/2025
FAC 3133EMXW Federal Farm Credit Bank DA DAV 11/17/2025 4/28/2028 970 AA1 AA+ 1.4 4.39 1.000,000 942,910 926,888	11095		3133ERT84	Federal Farm Credit Bank			1/14/2028	865 AA1		AA+		4.31	2,000,000	2,024,522	1,997,561	
11110 FAC 3133ETNU7 Federal Farm Credit Bank PS 723/2025 733/2028 1036 Aa1 AA+ 3.75 3.77 2,000.000 2,007.895 1,998.091	11115	FAC	3133ETMC8	Federal Farm Credit Bank	GPAC	8/20/2025	4/20/2028	962 Aaa		AA+	3.875	3.71	3,000,000	3,018,717	3,012,011	
11111 FAC 3133ETMU7 Federal Farm Credit Bank CASTLE 820/2025 7/3/2028 1036 Aa1 AA+ 3.75 3.73 3.00,000 3.491,843 3.01,894	11094			Federal Farm Credit Bank												
TRC 91282CFK2 U.S. Treasury CPAC 12/8/2023 915/2025 14 AA1 3.5 4.66 1,500,000 1,499,633	11110		3133ETNU7	Federal Farm Credit Bank				1036 Aa1		AA+			2,000,000	2,007,895	1,998,901	
TRC 912826500 U.S. Treasury MORETN 11/18/2022 9/30/2025 29 AA1 3 4.19 2.000,000 1,997,827 1,998,224	11111	FAC	3133ETNU7	Federal Farm Credit Bank	CASTLE	8/20/2025	7/3/2028	1036 Aa1		AA+	3.75	3.73	3,000,000	3,011,843	3,001,894	
TRC 91282CFP1 U.S. Treasury D.A. DAV 21/21/2023 10/15/2025 14 AA1 4.25 4.48 2,000,000 1,999,909 1,999,458	10981		91282CFK2	U.S. Treasury	GPAC	12/8/2023	9/15/2025	14 AA1			3.5	4.66	1,500,000	1,499,633	1,499,366	
TRC 91282CGA3 U.S. Treasury DA DAV 12/12/2023 12/15/2025 105 AA1 4 4.88 2.000,000 1,999,307 1,996,300 - 1,000,005 1,996,400 - 1,000,005 1,996,401 - 1,000,005 1,996,401 - 1,000,005 1,996,401 - 1,000,005 1,996,401 - 1,000,005 1,996,401 1,996,40	10945	TRC	9128285C0	U.S. Treasury	MORETN	11/18/2022	9/30/2025	29 AA1			3	4.19	2,000,000	1,997,827	1,998,234	
11100 TRC 91282CJS1 U.S. Treasury STIFEL 3/20/2025 12/31	11000	TRC	91282CFP1	U.S. Treasury	CASTLE	12/19/2023	10/15/2025	44 AA1			4.25	4.48	2,000,000	1,999,909	1,999,458	
10985 TRC 91282CGE5 U.S. Treasury R.W.B 12/12/2023 1/15/2026 136 AA1 3.875 4.84 2,000,000 1,998,156 1,993,257	10991		91282CGA3	U.S. Treasury	DA DAV	12/12/2023	12/15/2025	105 AA1				4.68	2,000,000	1,999,307	1,996,309	
10992 TRC 91282CGE5 U.S. Treasury R.W. B 12/12/2023 11/15/2026 136 AA1 3.875 4.64 2.000,000 1.998,156 1.994,611				U.S. Treasury												
11004 TRC 91282CGE5 U.S. Treasury CASTLE 11/5/2026 136 AA1 A.25 A.18 2,000,000 1,998,156 1,996,454				U.S. Treasury												
11103 TRC 91282CJV4 U.S. Treasury CASTLE 3/20/2025 1/31/2026 152 AA1 4.25 4.18 1,000,000 1,000,406 1,000,262			91282CGE5	U.S. Treasury			1/15/2026	136 AA1			3.875	4.64	2,000,000		1,994,611	
10966 TRC 91282CGL9 U.S. Treasury CASTLE 11/16/2023 2/15/2026 167 AA1 4 4.82 2,000,000 1,999,004 1,992,953 10977 TRC 91282CGL9 U.S. Treasury CASTLE 11/21/2023 2/15/2026 167 AA1 4 4.74 2,000,000 1,999,004 1,993,604 10995 TRC 91282CGL9 U.S. Treasury GPAC 12/19/2023 2/15/2026 167 AA1 1.625 4.62 2,000,000 1,978,211 1,974,262 11002 TRC 91282CGL9 U.S. Treasury GPAC 12/19/2023 2/15/2026 167 AA1 1.625 4.62 2,000,000 1,999,004 1,997,007 10978 TRC 91282CGR6 U.S. Treasury GPAC 12/19/2023 3/15/2026 167 AA1 4.4.4 4.34 2,000,000 1,999,004 1,997,007 10978 TRC 91282CGR6 U.S. Treasury CASTLE 11/21/2023 3/15/2026 195 AA1 4.625 4.71 2,000,000 2,007,080 1,999,097 11101 TRC 91282CGV7 U.S. Treasury CASTLE 12/19/2023 4/15/2026 226 AA1 3.75 4.29 2,000,000 1,997,055 1,993,712 11101 TRC 91282CGW7 U.S. Treasury CASTLE 3/20/2025 4/15/2026 226 AA1 3.75 4.14 2,000,000 1,997,055 1,995,349 11102 TRC 91282CHB0 U.S. Treasury PS 11117/2023 5/15/2026 256 AA1 3.625 4.66 2,000,000 1,995,539 1,986,418 110998 TRC 91282CHB0 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,6418 11098 TRC 91282CHB0 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,6418 11098 TRC 91282CHB0 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,648 11098 TRC 91282CHB0 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,993,064 11005 TRC 91282CHB0 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,993,064 11004 TRC 91282CHB0 U.S. Treasury CASTLE 12/19/2023 7/15/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.26 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 10970 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 10	11004	TRC	91282CGE5	U.S. Treasury	GPAC	12/19/2023	1/15/2026	136 AA1			3.875	4.38	2,000,000	1,998,156	1,996,454	
10977 TRC 91282CGL9 U.S. Treasury CASTLE 11/22/2023 2/15/2026 167 AA1				U.S. Treasury							4.25		1,000,000		1,000,262	
10995 TRC 91282CGL9 U.S. Treasury GPAC 12/19/2023 2/15/2026 167 AA1 1.625 4.62 2,000,000 1,978,211 1,974,262 11002 TRC 91282CGL9 U.S. Treasury GPAC 12/19/2023 2/15/2026 167 AA1 4.34 2,000,000 1,999,004 1,997,007 10978 TRC 91282CGR0 U.S. Treasury CASTLE 11/22/2023 3/15/2026 195 AA1 4.625 4.71 2,000,000 2,007,080 1,999,097 10999 TRC 91282CGV7 U.S. Treasury CASTLE 12/19/2023 4/15/2026 226 AA1 3.75 4.29 2,000,000 1,997,055 1,993,712 11101 TRC 91282CGV7 U.S. Treasury CASTLE 3/20/205 4/15/2026 226 AA1 3.75 4.29 2,000,000 1,997,055 1,993,349 10999 TRC 91282CHB0 U.S. Treasury PS 11/17/2023 5/15/2026 226 AA1 3.625 4.66 2,000,000 1,997,055 1,995,349 10974 TRC 91282CHB0 U.S. Treasury GPAC 11/22/2023 5/15/2026 256 AA1 3.625 4.66 2,000,000 1,995,539 1,986,418 11102 TRC 91282CHB0 U.S. Treasury GPAC 11/21/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,298 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,995,649 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,993,664 110963 TRC 91282CHM6 U.S. Treasury STIFEL 9/29/2023 7/15/2026 331 AA1 3.625 4.13 2,000,000 1,995,539 1,993,664 110963 TRC 91282CCP4 U.S. Treasury GPAC 11/12/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11055 TRC 91282CCP4 U.S. Treasury GPAC 11/14/2024 7/31/2026 333 AA1 0.625 4.26 2,000,000 1,941,693 1,937,143 11055 TRC 91282CCP4 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 0.625 4.26 1,000,000 2,008,859 1,995,414 110970 TRC 91282CHU8 U.S.	10966	_	91282CGL9	U.S. Treasury							4	4.82	2,000,000	1,999,004	1,992,953	
11002 TRC 91282CGL9 U.S. Treasury GPAC 12/19/2023 2/15/2026 167 AA1 4 4.34 2,000,000 1,999,004 1,997,007 10978 TRC 91282CGR6 U.S. Treasury CASTLE 11/22/2023 3/15/2026 195 AA1 4.625 4.71 2,000,000 2,007,080 1,999,097 10999 TRC 91282CGV7 U.S. Treasury CASTLE 12/19/2023 4/15/2026 226 AA1 3.75 4.29 2,000,000 1,997,055 1,993,712 11101 TRC 91282CGV7 U.S. Treasury CASTLE 3/20/2025 4/15/2026 226 AA1 3.75 4.14 2,000,000 1,997,055 1,993,712 10969 TRC 91282CHB0 U.S. Treasury PS 11/17/2023 5/15/2026 226 AA1 3.625 4.66 2,000,000 1,997,539 1,986,418 10970 TRC 91282R36 U.S. Treasury GPAC 11/22/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,418 11102 TRC 91282R36 U.S. Treasury CASTLE 3/20/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,418 11102 TRC 91282R36 U.S. Treasury CASTLE 3/20/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,517 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,993,064 110963 TRC 91282CHM6 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 4.5 4.88 3,000,000 3,014,766 2,990,770 11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury DADAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,937,143 11055 TRC 91282CCP4 U.S. Treasury DADAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 970,846 968,288 110970 TRC 91282CHW8 U.S. Treasury DADAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 970,846 968,288 110970 TRC 91282CHW8 U.S. Treasury DADAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHW8 U.S. Treasury DADAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHW8 U.S. Treasury DADAV 11/15/2024 7/31/2026 334 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHW8 U.S. Treasury DADAV 11/15/2024 7/31/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414 110970 TRC 91282CHW8 U.S														, ,		
10978 TRC 91282CGR6 U.S. Treasury CASTLE 11/22/2023 3/15/2026 195 AA1 4.625 4.71 2,000,000 2,007,080 1,999,097 10999 TRC 91282CGV7 U.S. Treasury CASTLE 12/19/2023 4/15/2026 226 AA1 3.75 4.29 2,000,000 1,997,055 1,993,712 11101 TRC 91282CGV7 U.S. Treasury CASTLE 3/20/2025 4/15/2026 226 AA1 3.75 4.14 2,000,000 1,997,055 1,995,349 10969 TRC 91282CHB0 U.S. Treasury PS 11/17/2023 5/15/2026 256 AA1 3.625 4.66 2,000,000 1,995,539 1,986,128 10974 TRC 91282CHB0 U.S. Treasury GPAC 11/22/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,298 10998 TRC 91282CBB0 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,986,298 11102 TRC 91282CBB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,995,171 11102 TRC 91282CBB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,993,064 10963 TRC 91282CBB0 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 4.5 4.88 3,000,000 3,014,766 2,990,770 11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 2,000,000 2,008,859 1,995,414				U.S. Treasury				167 AA1			1.625	4.62				
10999 TRC 91282CGV7 U.S. Treasury CASTLE 12/19/2023 4/15/2026 226 AA1 3.75 4.29 2,000,000 1,997,055 1,993,712 11101 TRC 91282CGV7 U.S. Treasury CASTLE 3/20/2025 4/15/2026 226 AA1 3.75 4.14 2,000,000 1,997,055 1,995,349 10969 TRC 91282CHB0 U.S. Treasury PS 11/17/2023 5/15/2026 256 AA1 3.625 4.66 2,000,000 1,995,559 1,986,418 10974 TRC 91282CHB0 U.S. Treasury GPAC 11/22/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,298 10998 TRC 91282CHB0 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,968,125 1,965,171 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,986,298 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,993,064 110963 TRC 91282CHM6 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 4.5 4.88 3,000,000 3,014,766 2,990,770 11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,887 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,869 968,288 110970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414	11002		91282CGL9	U.S. Treasury		12/19/2023	2/15/2026	167 AA1			-		2,000,000	1,999,004	1,997,007	
11101 TRC 91282CGV7 U.S. Treasury CASTLE 3/20/2025 4/15/2026 226 AA1 3.75 4.14 2,000,000 1,997,055 1,995,349 10969 TRC 91282CHB0 U.S. Treasury PS 11/17/2023 5/15/2026 256 AA1 3.625 4.66 2,000,000 1,995,539 1,986,418 10974 TRC 91282CHB0 U.S. Treasury GPAC 11/22/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,288 11/102 TRC 91282R36 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,986,288 11/102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.26 2,000,000 1,995,539 1,995,171 11/102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,995,171 11/102 TRC 91282CHB0 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 3.625 4.13 2,000,000 3,014,766 2,990,770 11/1044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11/1051 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,087 11/1055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 970,869 968,288 11/1057 TRC 91282CCP4 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414			91282CGR6	U.S. Treasury	CASTLE	11/22/2023	3/15/2026	195 AA1			4.625	4.71	2,000,000	2,007,080	1,999,097	
10969 TRC 91282CHB0 U.S. Treasury PS 11/17/2023 5/15/2026 256 AA1 3.625 4.66 2,000,000 1,995,539 1,986,418 10974 TRC 91282CHB0 U.S. Treasury GPAC 11/22/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,298 10998 TRC 91282R36 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 1.625 4.26 2,000,000 1,968,125 1,965,171 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,993,064 10963 TRC 91282CHB0 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 3.625 4.13 2,000,000 1,995,539 1,993,064 11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,663 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,087 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 970,846 968,288 10970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414	10999		91282CGV7	U.S. Treasury	CASTLE	12/19/2023	4/15/2026	226 AA1			3.75	4.29	2,000,000	1,997,055	1,993,712	
10974 TRC 91282CHB0 U.S. Treasury GPAC 11/22/2023 5/15/2026 256 AA1 3.625 4.67 2,000,000 1,995,539 1,986,298 10998 TRC 91282R36 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 1.625 4.26 2,000,000 1,968,125 1,965,171 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,993,064 10963 TRC 91282CHM6 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 4.5 4.88 3,000,000 3,014,766 2,990,770 111044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,087 - 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 970,846 968,288 110970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414				U.S. Treasury											1,995,349	
10998 TRC 91282R36 U.S. Treasury CASTLE 12/19/2023 5/15/2026 256 AA1 1.625 4.26 2,000,000 1,968,125 1,965,171 11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,993,064 10963 TRC 91282CHM6 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 4.5 4.88 3,000,000 3,014,766 2,990,770 11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,087 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 110970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414				,												
11102 TRC 91282CHB0 U.S. Treasury CASTLE 3/20/2025 5/15/2026 256 AA1 3.625 4.13 2,000,000 1,995,539 1,993,064 10963 TRC 91282CHM6 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 4.5 4.88 3,000,000 3,014,766 2,990,770 11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,878 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,869 968,288 10970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414																
10963 TRC 91282CHM6 U.S. Treasury STIFEL 9/29/2023 7/15/2026 317 AA1 4.5 4.88 3,000,000 3,014,766 2,990,770 11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,937,143 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 970,866 968,288 10970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414	10998		912828R36	U.S. Treasury			5/15/2026	256 AA1				4.26	2,000,000	1,968,125	1,965,171	
11044 TRC 91282CCP4 U.S. Treasury GPAC 11/6/2024 7/31/2026 333 AA1 0.625 4.23 2,000,000 1,941,693 1,937,143 11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,087 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 10970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414	11102		91282CHB0	U.S. Treasury	CASTLE	3/20/2025	5/15/2026	256 AA1			3.625	4.13	2,000,000	1,995,539	1,993,064	
11051 TRC 91282CCP4 U.S. Treasury CASTLE 11/14/2024 7/31/2026 333 AA1 0.625 4.29 2,000,000 1,941,693 1,936,087 11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 10970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414	10963		91282CHM6	U.S. Treasury	STIFEL	9/29/2023	7/15/2026	317 AA1			4.5	4.88	3,000,000	3,014,766	2,990,770	
11055 TRC 91282CCP4 U.S. Treasury DA DAV 11/15/2024 7/31/2026 333 AA1 0.625 4.26 1,000,000 970,846 968,288 10970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,008,859 1,995,414	11044	TRC	91282CCP4	U.S. Treasury	GPAC	11/6/2024	7/31/2026	333 AA1			0.625	4.23	2,000,000	1,941,693	1,937,143	
10970 TRC 91282CHU8 U.S. Treasury GPAC 11/17/2023 8/15/2026 348 AA1 4.375 4.63 2,000,000 2,006,859 1,995,414	11051	TRC	91282CCP4	U.S. Treasury	CASTLE	11/14/2024	7/31/2026	333 AA1			0.625	4.29	2,000,000	1,941,693	1,936,087	
	11055	TRC	91282CCP4	U.S. Treasury	DA DAV	11/15/2024	7/31/2026	333 AA1			0.625	4.26	1,000,000	970,846	968,288	
11050 TRC 91282CLH2 U.S. Treasury CASTLE 11/14/2024 8/31/2026 364 AA1 3.75 4.30 2,000,000 1,997,469 1,989,537	10970	TRC	91282CHU8	U.S. Treasury	GPAC	11/17/2023	8/15/2026	348 AA1			4.375	4.63	2,000,000	2,008,859	1,995,414	
	11050	TRC	91282CLH2	U.S. Treasury	CASTLE	11/14/2024	8/31/2026	364 AA1			3.75	4.30	2,000,000	1,997,469	1,989,537	

					Purchase	Maturity	Days To	Ratings	3	Coupon		Par	Market	Book	Call
Inv#	Inv Type	CUSIP	Security	Broker	Date	Date	Maturity	Moodys	S&P/Fitch	Rate	YTM 365	Value	Value	Value	Date
11060	TRC	91282CLH2	U.S. Treasury	CASTLE	11/22/2024	8/31/2026	364	AA1		3.75	4.35	2,000,000	1,997,469	1,988,616	
11049	TRC	91282CLP4	U.S. Treasury	CASTLE	11/14/2024	9/30/2026				3.5	4.29	2,000,000	1,992,422	1,983,778	
10973	TRC	91282CJC6	U.S. Treasury	STIFEL	11/17/2023	10/15/2026				4.625	4.59	2,000,000	2,017,266	2,000,675	
10996	TRC	91282CJC6	U.S. Treasury	STIFEL	12/12/2023	10/15/2026				4.625	4.46	2,000,000	2,017,266	2,003,433	
11066	TRC	91282CJC6	U.S. Treasury	PS	11/22/2024	10/15/2026				4.625	4.32	2,000,000	2,017,266	2,006,447	
10997	TRC	91282CJK8	U.S. Treasury	STIFEL	12/12/2023	11/15/2026				4.625	4.45	2,000,000	2,018,750	2,003,862	
11058	TRC	91282CJK8	U.S. Treasury	CASTLE	11/22/2024	11/15/2026	440			4.625	4.31	2,000,000	2,018,750	2,007,179	
11069	TRC	91282CJK8	U.S. Treasury	GPAC	11/25/2024	11/15/2026				4.625	4.34	2,000,000	2,018,750	2,006,493	
11022	TRC	91282CJP7	U.S. Treasury	CASTLE	3/21/2024	12/15/2026				4.375	4.50	2,000,000	2,014,531	1,996,913	
11068	TRC	91282CJP7	U.S. Treasury	DA DAV	11/25/2024	12/15/2026				4.375	4.33	2,000,000	2,014,531	2,001,065	
11021 11061	TRC TRC	91282CJT9	U.S. Treasury	CASTLE	3/21/2024	1/15/2027	501			4	4.49	2,000,000	2,006,016	1,987,536	
11070	TRC	91282CJT9 91282CJT9	U.S. Treasury U.S. Treasury	CASTLE GPAC	11/22/2024 11/25/2024	1/15/2027 1/15/2027	501 . 501 .			4	4.31 4.32	2,000,000 2,000,000	2,006,016 2,006,016	1,991,862 1,991,631	
11070	TRC	91282CKA8	U.S. Treasury	PS	11/25/2024	2/15/2027	532			4.125	4.32	2,000,000	2,010,469	1,994,470	
11063	TRC	91282CKE0	U.S. Treasury	DA DAV	11/23/2024	3/15/2027	560			4.125	4.28	2,000,000	2,015,547	1,999,030	
11075	TRC	91282CKE0	U.S. Treasury	CASTLE	11/25/2024	3/15/2027	560			4.25	4.32	2,000,000	2,015,547	1,997,813	
11059	TRC	91282CKJ9	U.S. Treasury	CASTLE	11/22/2024	4/15/2027	591			4.5	4.30	2,000,000	2,024,688	2,006,128	
11071	TRC	91282CKJ9	U.S. Treasury	GPAC	11/25/2024	4/15/2027	591			4.5	4.31	2,000,000	2,024,688	2,005,725	
11057	TRC	91282CKR1	U.S. Treasury	CASTLE	11/22/2024	5/15/2027	621			4.5	4.29	2,000,000	2,026,406	2,006,708	
11086	TRC	91282CKV2	U.S. Treasury	GPAC	12/6/2024	6/15/2027	652			4.625	4.13	1,500,000	1,524,375	1,512,570	
11038	TRC	912828ZV5	U.S. Treasury	GPAC	10/25/2024	6/30/2027	667			0.5	3.98	1,000,000	944,766	940,191	
11031	TRC	91282CFB2	U.S. Treasury	CASTLE	10/4/2024	7/31/2027	698			2.75	3.62	1,000,000	983,398	984,329	
11040	TRC	91282CFB2	U.S. Treasury	CASTLE	10/25/2024	7/31/2027	698			2.75	4.00	1,000,000	983,398	977,625	
11052	TRC	91282CFB2	U.S. Treasury	STIFEL	11/14/2024	7/31/2027	698			2.75	4.24	2,000,000	1,966,797	1,946,630	
11072	TRC	91282CFB2	U.S. Treasury	GPAC	11/25/2024	7/31/2027	698	AA1		2.75	4.30	2,000,000	1,966,797	1,944,465	
11085	TRC	91282CFB2	U.S. Treasury	STIFEL	12/6/2024	7/31/2027	698	AA1		2.75	4.13	1,500,000	1,475,098	1,462,795	
11032	TRC	9128282R0	U.S. Treasury	CASTLE	10/4/2024	8/15/2027	713	AA1		2.25	3.61	1,000,000	973,867	974,867	
11048	TRC	91282CLG4	U.S. Treasury	CASTLE	11/14/2024	8/15/2027	713	AA1		3.75	4.25	2,000,000	2,003,750	1,981,580	
11067	TRC	91282CFH9	U.S. Treasury	DA DAV	11/25/2024	8/31/2027	729	AA1		3.125	4.30	2,000,000	1,980,547	1,956,332	
11084	TRC	91282CFH9	U.S. Treasury	STIFEL	12/6/2024	8/31/2027	729	AA1		3.125	4.12	2,000,000	1,980,547	1,962,596	
11080	TRC	91282CLL3	U.S. Treasury	PS	12/6/2024	9/15/2027	744			3.375	4.12	2,000,000	1,990,313	1,971,655	
11053	TRC	91282CAL5	U.S. Treasury	GPAC	11/14/2024	9/30/2027	759			0.375	4.25	2,000,000	1,871,250	1,849,838	
11074	TRC	91282CAL5	U.S. Treasury	CASTLE	11/25/2024	9/30/2027	759			0.375	4.30	1,000,000	935,625	923,867	
11076	TRC	91282CLQ2	U.S. Treasury	CASTLE	11/25/2024	10/15/2027	774			3.875	4.30	2,000,000	2,009,844	1,983,133	
11046	TRC	91282CFU0	U.S. Treasury	CASTLE	11/6/2024	10/31/2027	790			4.125	4.16	2,000,000	2,020,469	1,998,413	
11087	TRC	9128283F5	U.S. Treasury	GPAC	12/6/2024	11/15/2027	805			2.25	4.12	2,000,000	1,942,422	1,923,056	
11081	TRC	91282CGC9	U.S. Treasury	DA DAV	12/6/2024	12/31/2027	851			3.875	4.10	2,000,000	2,011,719	1,990,198	
11090	TRC	91282CBB6	U.S. Treasury	CASTLE	1/8/2025	12/31/2027	851			0.625	4.34	2,000,000	1,867,734	1,839,263	
11093 11083	TRC TRC	91282CMF5 91282CBJ9	U.S. Treasury	DA DAV STIFEL	1/15/2025 12/6/2024	1/15/2028 1/31/2028	866 882			4.25 0.75	4.33 4.12	2,000,000	2,028,594 1,869,141	1,996,425 1,848,639	
11089	TRC	9128283W8	U.S. Treasury	CASTLE	1/8/2025	2/15/2028				2.75	4.12	2,000,000	2,450,488		
11009	TRC	9128283W8	U.S. Treasury U.S. Treasury	PS	1/17/2025	2/15/2028				2.75	4.30	2,500,000 2,000,000	1,960,391	2,408,614 1,929,772	
11082	TRC	91282CGP0	U.S. Treasury	STIFEL	12/6/2024	2/29/2028				4	4.12	2,000,000	2,018,828	1,994,460	
11079	TRC	91282CBS9	U.S. Treasury	PS	12/6/2024	3/31/2028				1.25	4.12	2,000,000	1,885,313	1,863,022	
11091	TRC	91282CGT2	U.S. Treasury	PS	1/8/2025	3/31/2028				3.625	4.35	2,000,000	2,001,484	1,965,327	
11098	TRC	91282CGT2	U.S. Treasury	CASTLE	1/17/2025	3/31/2028				3.625	4.32	2,000,000	2,001,484	1,966,760	
11078	TRC	91282CHA2	U.S. Treasury	PS	12/6/2024	4/30/2028				3.5	4.12	2,000,000	1,994,766	1,969,649	
11109	TRC	91282CND9	U.S. Treasury	CASTLE	7/23/2025	5/15/2028				3.75	3.76	2,000,000	2,007,891	1,999,174	
11112	TRC	9128284N7	U.S. Treasury	CASTLE	8/20/2025	5/15/2028		AA1		2.875	3.71	3,000,000	2,944,453	2,936,321	
11097	TRC	91282CCE9	U.S. Treasury	STIFEL	1/17/2025	5/31/2028				1.25	4.32	1,000,000	939,102	922,198	
11113	TRC	91282CCH2	U.S. Treasury	STIFEL	8/20/2025	6/30/2028				1.25	3.71	3,000,000	2,812,500	2,803,996	
11099	MC1	478160BY9	Johnson & Johnson	GPAC	3/20/2025	3/1/2026	181		AAA	2.45	4.20	2,000,000	1,983,535	1,983,005	12/1/2025
10865	MC1	037833DN7	Apple Inc	GPAC	11/18/2021	9/11/2026	375	Aaa	AA+	2.05	1.46	2,000,000	1,963,222	2,011,764	7/11/2026
11064	MC1	037833DN7	Apple Inc	GPAC	11/22/2024	9/11/2026			AA+	2.05	4.41	2,000,000	1,963,222	1,953,821	
11065	MC1	48125LRU8	JPMorgan Chase - Corporate N	GPAC	11/22/2024	12/8/2026			AA-	5.11	4.52	2,000,000	2,025,698		11/8/2026
11039	MC1	037833DB3	Apple Inc	GPAC	10/25/2024	9/12/2027			AA+	2.9	4.10	1,000,000	984,002	977,217	
11045	MC1	037833DB3	Apple Inc	GPAC	11/6/2024	9/12/2027			AA+	2.9	4.26	2,000,000	1,968,005	1,948,274	6/12/2027
11108	MC1	037833EH9	Apple Inc	GPAC	7/23/2025	8/5/2028			AA+	1.4	3.92	2,000,000	1,871,331	1,862,362	6/5/2028
11114	MC1	166756BH8	Chevron Corp	PS	8/20/2025	8/13/2028			AA-	4.05	3.93	2,000,000	2,011,334	2,006,394	7/13/2028
10951	MUN	752147HJ0	RANCHO SANTIAGO CA CMNTY CLG D	GPAC	12/1/2022	9/1/2025		AA1	AA	0.734	4.63	1,895,000	1,895,000	1,895,000	
10930	MUN	13048VLK2	CA ST MUNI FIN AUTH REVENUE	GPAC	10/26/2022	10/1/2025				2.148	5.00	2,060,000	2,056,539	2,055,497	
10871	MUN	250325UL9	DESCHUTES CTY SCH DIST #1	R W B	12/7/2021	6/15/2026				1.4	1.23	2,000,000	1,960,300	2,002,599	
10870	MUN	569280EX4	Salem-Keizer School District	PS	12/7/2021	6/15/2026				1.438	1.29	2,000,000	1,960,080	2,002,261	
10845	MUN	736688MF6	Portland Community College	MORETN	7/23/2021	6/15/2026				0.899	0.80	1,250,000	1,219,550	1,250,955	
11042	MUN	569203MG4	Salem-Keizer School District	PS	11/6/2024	6/30/2026	302	Ha∠		3.218	4.36	1,750,000	1,739,203	1,734,118	

					Purchase	Maturity	Days To	Ratings	;	Coupon		Par	Market	Book	Call
Inv#	Inv Type	CUSIP	Security	Broker	Date	Date	Maturity	Moodys	S&P/Fitch	Rate	YTM 365	Value	Value	Value	Date
10875	MUN	68587FAW4	OR EDU DISTS FF&C PENSION OBLI	RWB	12/8/2021	6/30/2026	302	AA2	AA	1.10	1.39	250,000	244,400	249,434	
10863	MUN	68583RCV2	OR ST COMMUNITY COLLEGE DIST	GPAC	11/18/2021	6/30/2026	302	Aa1	AA+	5.68	1.40	210,000	212,869	217,204	
10876	MUN	68607DVC6	ODOT HWY USER TAX REV	RWB	12/8/2021	11/15/2026	440	Aa1	AAA	0.93	1.37	260,000	251,407	258,694	
11036	MUN	68609TWF1	Oregon State Lottery	STIFEL	10/23/2024	5/1/2027	607	Aa1	AA+	1.32	4.05	1,000,000	960,480	957,075	
11029	MUN	91412HGF4	UNIV OF CALIFORNIA CA REVENUES	STIFEL	9/25/2024	5/15/2027	621	AA2	AA	1.32	3.70	1,000,000	959,680	961,589	
11056	MUN	473448EZ7	JEFFERSON COUNTY SCHOOL DIST	STIFEL	11/15/2024	6/15/2027	652	AA1		1.79	4.32	1,580,000	1,525,964	1,512,822	
11034	MUN	515390PX4	Lane County School District	PS	10/9/2024	6/15/2027	652	Aa1		1.10	4.01	500,000	476,720	475,590	
11037	MUN	68587FAX2	OR EDU DISTS FF&C PENSION OBLI	GPAC	10/24/2024	6/30/2027	667	AA2	AA	1.36	4.09	1,260,000	1,206,929	1,200,913	
11027	MUN	685869FR5	OR ST COMMUNITY COLLEGE DIST	GPAC	9/25/2024	7/1/2027	668	Aa3	A+	2.60	3.60	505,000	492,491	495,908	
11028	MUN	68608USZ0	Oregon State Lottery	GPAC	9/24/2024	8/1/2027	699	Aa1	AA+	3.23	3.64	515,000	510,303	511,152	
11035	MUN	68609TNF1	Oregon State Lottery	STIFEL	10/23/2024	11/1/2027	791	Aa1	AA+	2.10	4.11	400,000	386,396	383,740	
11073	MUN	0793653X8	City of Bellevue WA	STIFEL	11/25/2024	12/1/2027	821	Aaa	AAA	1.12	4.35	1,200,000	1,131,696	1,119,063	
11092	MUN	473448FA1	JEFFERSON COUNTY SCHOOL DIST	PS	1/8/2025	6/15/2028	1,018	AA1		1.87	4.49	1,920,000	1,823,981	1,791,249	
11088	MUN	68587FAY0	OR EDU DISTS FF&C PENSION OBLI	STIFEL	12/6/2024	6/30/2028	1,033	Aa2	AA	1.53	4.21	975,000	914,765	907,047	
10078	RRP	SYS10078	Local Govt Investment Pool		7/1/2006		1			4.60	4.60	35,844,195	35,844,195	35,844,195	
10084	RR2	SYS10084	First Interstate Bank		7/1/2006		1			4.25	4.25	9,000,000	9,000,000	9,000,000	
10085	RR2	SYS10085	First Interstate Bank		10/13/2023		1			4.25	4.25	7,993,874	7,993,874	7,993,874	
11107	ATD	912797QY6	U.S. Treasury	CASTLE	6/12/2025	12/11/2025	101			4.14	4.35	3,000,000	2,966,685	2,965,155	
												302,368,068	299,955,607	298,753,295	



Deschutes County Administrative Policy No. F-10

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Revised Date: December 27, 2017
Revised Date: December 27, 2017
Revised Date: August 27, 2025

INVESTMENT POLICY GUIDELINES

PURPOSE

This Investment Policy defines the parameters within which funds are to be invested by Deschutes County. Deschutes County's purpose is to provide County Level Services for a large portion of Central Oregon. This policy also formalizes the framework, pursuant to ORS 294.135, for Deschutes County's investment activities to ensure effective and judicious management of funds within the scope of this policy.

These guidelines are intended to be broad enough to allow designated investment staff to function properly within the parameters of responsibility and authority, yet specific enough to adequately safeguard the investment assets.

GOVERNING AUTHORITY

Deschutes County's investment program shall be operated in conformance with Oregon Revised Statutes and applicable Federal Law. Specifically, this investment policy is written in conformance with ORS 294.035; 294.040; 294.052; 294.135; 294.145; and 294.810. All funds within the scope of this policy are subject to Laws established by the State of Oregon. Any revisions or extensions of these sections of the ORS shall be assumed to be part of this Investment Policy immediately upon being enacted.

SCOPE

This policy applies to activities of Deschutes County with regard to investing the financial assets of all County funds including County Service Districts and Trust Funds. Investments of employees' retirement funds, deferred compensation plans, and other funds are not covered by this policy. The amount of funds falling within the scope of this policy over the next three years is expected to range between \$160 million and \$230 million.

GENERAL OBJECTIVES

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

- 1. **Preservation of Invested Capital.** Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The goal is to manage credit risk and interest rate risk.
- 2. **Liquidity**. The investment portfolio shall remain sufficiently liquid to meet all reasonably anticipated operating requirements. Furthermore, the portfolio should consist largely of securities with active secondary or resale markets. A portion of the portfolio also may be placed in the Oregon

Short Term Fund which offers next-day liquidity. Where possible and prudent, the portfolio should be structured so that investments mature concurrent with anticipated demands.

3. **Return.** The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into consideration the safety and liquidity needs of the portfolio. Although return consists of both principal return (gains and losses due to market value fluctuations) and income return (yield), this policy discourages active trading and turnover of investments. Investments should generally be held to maturity.

STANDARDS OF CARE

1. **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 and appropriate action is taken to control adverse developments within a timely fashion as defined in 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."

2. Ethics and Conflicts of Interest. Officers and employees involved in the investment process shall refrain from personal activity 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 any material interests in financial institutions with which they conduct business. Disclosure shall be made to the governing body. 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 whom business is conducted on behalf of the County. Officers and employees shall, at all times, comply with the State of Oregon Government Standards and Practices code of ethics set forth in ORS Chapter 244.

3. Delegation of Authority and Responsibilities

- a. Governing Body. The Board of County Commissioners will retain ultimate fiduciary responsibility for invested funds. The governing body will receive reports, pursuant to, and with sufficient detail to comply with ORS 294.155.
- b. Delegation of Authority. Authority to manage investments within the scope of this policy and operate the investment program in accordance with established written procedures and internal controls is granted to the Treasurer and/or Chief Financial Officer, hereinafter referred to as Investment Officer, and derived from the following: ORS 294.035 to 294.053, 294.125 to 294.145, and 294.810.

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.

All participants in the investment process shall seek to act responsibly as custodians of the public Policy #F-10, Investment Policy Guidelines

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- trust. No officer or designee may engage in an investment transaction except as provided under the terms of this policy and supporting procedures.
- c. Investment Committee. The Deschutes County Board of County Commissioners established an investment advisory committee on April 19, 1995 by resolution 95-12520 to provide guidance to the Investment Officer and monitor investment policy compliance.
- d. Investment Adviser. The Investment Officer may engage the services of one or more external investment managers to assist in the management of the County's investment portfolio in a manner consistent with this investment policy. Investment advisers may be hired on a non-discretionary basis. All investment transactions by approved investment advisers must be preapproved in writing by the Investment Officer and compliant with this Investment Policy. If the Investment Officer hires an investment adviser to provide investment management services, the adviser is authorized to transact with its direct dealer relationships on behalf of Deschutes County.

TRANSACTION COUNTERPARTIES, INVESTMENT ADVISERS AND DEPOSITORIES

1. **Broker/Dealers.** The Investment Officer shall determine which broker/dealer firms and registered representatives are authorized for the purposes of investing funds within the scope of this investment policy. A list will be maintained of approved broker/dealer firms and affiliated registered representatives.

The following minimum criteria must be met prior to authorizing investment transactions. The Investment Officer may impose more stringent criteria.

- a. Broker/Dealer firms must meet the following minimum criteria:
 - i. Be registered with the Securities and Exchange Commission (SEC);
 - ii. Be registered with the Financial Industry Regulatory Authority (FINRA).
 - iii. Provide most recent audited financials.
 - iv. Provide FINRA Focus Report filings.
- b. Approved broker/dealer employees who execute transactions with Deschutes County must meet the following minimum criteria:
 - i. Be a registered representative with the Financial Industry Regulatory Authority (FINRA);
 - ii. Be licensed by the state of Oregon;
 - iii. Provide certification (in writing) of having read; understood; and agreed to comply with the most current version of this investment policy.
- c. Periodic (at least annual) review of all authorized broker/dealers and their respective authorized registered representatives will be conducted by the Investment Officer. Factors to consider would be:
 - i. Pending investigations by securities regulators.
 - ii. Significant changes in net capital.
 - iii. Pending customer arbitration cases.
 - iv. Regulatory enforcement actions.
- 2. **Investment Advisers.** A list will be maintained of approved advisers selected by conducting a process of due diligence.
 - a. The following items are required for all approved Investment Advisers:

- i. The investment adviser firm must be registered with the Securities and Exchange Commission (SEC) or licensed by the state of Oregon; (Note: Investment adviser firms with assets under management > \$100 million must be registered with the SEC, otherwise the firm must be licensed by the state of Oregon)
- ii. All investment adviser firm representatives conducting investment transactions on behalf of Deschutes County must be registered representatives with FINRA;
- iii. All investment adviser firm representatives conducting investment transactions on behalf of Deschutes County must be licensed by the state of Oregon;
- iv. Certification, by all of the adviser representatives conducting investment transactions on behalf of Deschutes County, of having read, understood and agreed to comply with this investment policy.
- b. A periodic (at least annual) review of all authorized investment advisers will be conducted by the Investment Officer to determine their continued eligibility within the portfolio guidelines. Factors to consider would be:
 - i. Pending investigations by securities regulators.
 - ii. Significant changes in net capital.
 - iii. Pending customer arbitration cases.
 - iv. Regulatory enforcement actions.
- 3. **Depositories.** All financial institutions who desire to become depositories must be qualified Oregon Depositories pursuant to ORS Chapter 295.

4. Competitive Transactions

- a. The Investment Officer shall obtain and document competitive bid information on all investments purchased or sold in the secondary market. Competitive bids or offers should be obtained, when possible, from at least three separate brokers/financial institutions or through the use of a nationally recognized trading platform.
- b. In the instance of a security for which there is no readily available competitive bid or offering on the same specific issue, the Investment Officer shall document quotations for comparable or alternative securities.
- c. When purchasing original issue securities, no competitive offerings will be required as all dealers in the selling group offer those securities at the same original issue price. However, the Investment Officer is encouraged to document quotations on comparable securities.
- d. If an investment adviser provides investment management services, the adviser must retain documentation of competitive pricing execution on each transaction and provide upon request.

ADMINISTRATION AND OPERATIONS

- 1. **Delivery vs. Payment.** All trades of marketable securities will be executed (cleared and settled) by delivery vs. payment (DVP) to ensure that securities are deposited in the County's safekeeping institution prior to the release of funds.
- 2. **Third-Party Safekeeping.** Securities will be held by an independent third-party safekeeping institution selected by the County. All securities will be evidenced by safekeeping receipts in the County's name. Upon request, the safekeeping institution shall make available a copy of its Statement on Standards for Attestation Engagements (SSAE) No. 16.

3. **Internal Controls.** The investment officer is responsible for establishing and maintaining an adequate internal control structure designed to reasonably assure that invested funds are invested within the parameters of this Investment policy and, protected from loss, theft or misuse. Specifics for the internal controls shall be documented in writing. The established control structure shall be reviewed and updated periodically by the Investment Officer.

The concept of reasonable assurance recognizes that the cost of a control should not exceed the benefits likely to be derived and the valuation of costs and benefits requires estimates and judgments by management.

The internal controls shall address the following points at a minimum:

- a. Compliance with Investment Policy.
- b. Control of collusion.
- c. Separation of transaction authority from accounting and record keeping.
- d. Custodial safekeeping.
- e. Avoidance of physical delivery of securities whenever possible and address control requirements for physical delivery where necessary.
- f. Clear delegation of authority to subordinate staff members.
- g. Confirmation of transactions for investments and wire transfers in written or digitally verifiable electronic form.
- h. Dual authorizations of wire and automated clearing house (ACH) transfers.
- i. Staff training.
- j. Review, maintenance and monitoring of security procedures both manual and automated.
- 4. An external auditor in conjunction with the annual County audit shall review compliance with Oregon state law and Deschutes County policies and procedures.

SUITABLE AND AUTHORIZED INVESTMENTS

- 1. **Permitted Investments.** The following investments are permitted pursuant to ORS 294.035, 294.040, and ORS 294.810. (Note: Permitted investments may be more restrictive than ORS 294.035 and 294.810).
 - a. US Treasury Obligations. U.S. Treasury and other government obligations that carry the full faith and credit guarantee of the United States for the timely payment of principal and interest.
 - b. US Agency Obligations. Senior debenture obligations of US federal agencies and instrumentalities or U.S. government sponsored enterprises (GSE).
 - c. Oregon Short Term Fund.

- d. Corporate Indebtedness.
- e. Commercial Paper issued under the authority of section 3(a)2 or 3(a)3 of the Securities Act of 1933.
- f. Corporate Bonds.
- g. Municipal Debt.
- h. Bankers Acceptances.
- i. Qualified Institution Time Deposits/Savings Accounts/Certificates of Deposit.
- 2. **Approval of Permitted Investments.** If additional types of securities are considered for investment, per Oregon state statute they will not be eligible for investment until this Policy has been amended and the amended version adopted by Deschutes County.

3. Prohibited Investments

- a. Private Placement or "144A" Securities. Private placement or "144A" securities are not allowed. For purposes of the policy, SEC Rule 144A securities are defined to include commercial paper privately placed under section 4(a)(2) of the Securities Act of 1933.
- b. US Agency Mortgage-backed Securities. US agency mortgage-backed securities such as those securities issued by FNMA and FHLMC are not allowed.
- c. Securities Lending. The County shall not lend securities nor directly participate in a securities lending program.

4. Demand Deposits and Time Deposits

- All demand deposits and time deposits (Examples of time deposits are: certificates of deposit and savings accounts) shall be held in qualified Oregon depositories in accordance with ORS Chapter 295.
- b. Demand deposits in qualified depository institutions are considered cash vehicles and not investments and are therefore outside the scope and restrictions of this policy. Pursuant to ORS 294.035(3)(d), time deposits, certificates of deposit and savings accounts are considered investments and within the scope of this policy.

INVESTMENT PARAMETERS

- 1. **Credit Risk.** Credit risk is the risk that a security or a portfolio will lose some or all of its value due to a real or perceived change in the ability of the issuer to repay its debt. Credit risk will be managed by the following guidelines:
 - a. Diversification. It is the policy of Deschutes County to diversify its investments. Where appropriate, exposures will be limited by security type; maturity; issuance, issuer, and security type, Allowed security types and Investment exposure limitations are detailed in the table below.
 - b. Recognized Credit Ratings. Investments must have a rating from at least one of the following nationally recognized statistical ratings organizations (NRSRO): Moody's Investors Service;

- Standard & Poor's; and Fitch Ratings Service as detailed in the table below. At least one such rating must meet the minimum rating requirements shown in the table below. Ratings used to apply the guidelines below should be investment level ratings and not issuer level ratings.
- c. Portfolio Average Credit Rating. The minimum weighted average credit rating of the portfolio's rated investments shall be Aa2/AA/AA by Moody's Investors Service; Standard & Poor's; and Fitch Ratings Service respectively. For purposes of evaluating the average credit rating for the portfolio, the County will use the single rating for those securities that only have one rating, the lower of two ratings for those securities that have two ratings and the middle rating for those securities that have three ratings.
- d. Exposure Constraints and Minimum Investment Credit Ratings. The following table limits exposures among investments permitted by this policy.

	Maximum %	Minimum Ratings	Oregon Revised Statue
Issue Type	Holdings	Moody's/S&P/Fitch	Reference
US Treasury Obligations	100%	N/A	
US Agency Securities	100%		
Per Agency (Senior Obligations Only)	33%		
Oregon Short Term Fund	Maximum allowed		
	per ORS 294.810		
Bankers' Acceptances	25%	A1+/P1/F1+	25% maximum holding per ORS 294.035(3)(h)(C).
Time Deposits, Savings Accounts,	50%		Authorized by ORS 294.035(3)(d).
Certificates of Deposit			
Per Institution	25%		
Corporate Debt (Total)	25%		35% maximum holding per ORS 294.035(3)(h)(D).
Corporate Commercial Paper per Issuer	5%	A1/P1/F1	5% maximum holding per ORS 294.035(3)(h)(D).
Corporate Bonds			
Per Oregon Issuer	5%	A2/A/A	5% max holding per ORS 294.035(3)(h)(D), A- min rating per ORS 294.035(3)(b).
All Other Issuers	5%	Aa3/AA-/AA-	5% max holding per ORS 294.035(3)(h)(D), AA- min rating for CA, WA & ID per ORS 294.035(3)(b).
Municipal Debt	25%		
Municipal Bonds		Aa3/AA-/AA-	

- e. Restriction on Issuers with Prior Default History. Per ORS 294.040, the bonds of issuers listed in ORS 294.035 (3)(a) to (c) may be purchased only if there has been no default in payment of either the principal of or the interest on the obligations of the issuing county, port, school district or city, for a period of five years next preceding the date of the investment.
- 2. **Liquidity Risk.** Liquidity risk is the risk that an investment may not be easily marketable or redeemable. The following strategies will be employed to manage liquidity risks:
 - a. The value of at least 10% of funds available for investing or three months of budgeted operating expenditures will be invested in the Oregon Short Term Fund, with a qualified depository institution, or investments maturing in less than 30 days to provide sufficient liquidity for expected disbursements.
 - b. Funds in excess of liquidity requirements are allowed for investments maturing in greater than one year. However, longer-term investments tend to be less liquid than shorter term investments.

Portfolio investment maturities will be limited as follows:

Total Portfolio Maturity Constraints:

	Minimum % of Total
Maturity Constraints	Portfolio
Under 30 days	10% or three months
	est. operating
	expenditures
Under 1 year	25%
Under 5 years	100%
Weighted Average Maturity of Portfolio	2.0 years

- c. Reserve or Capital Improvement Project funds may be invested in securities exceeding the maximum term if the maturities of such investments are made to coincide as nearly as practicable with the expected use of the funds.
- d. Larger issuance sizes enhance liquidity as there are likely to be a greater number of investors. Issuance sizes above a minimum amount qualify a corporate or municipal debt bond issuance for index eligibility. Index eligible bonds have a significantly larger investor base which improves liquidity.
- e. Limiting investment in a specific debt issuance improves secondary market liquidity by assuring there are other owners of the issuance.

	Maximum % of
Issue Type	Issuance (Par)
US Agency Securities	50%
Corporate Debt	
Corporate Commercial Paper	25%
Corporate Bonds	25%
Municipal Bonds	25%

- 3. **Interest Rate Risk.** Longer-term investments have the potential to achieve higher returns but are also likely to exhibit higher market value volatility due to the changes in the general level of interest rates over the life of the investment(s). Interest rate risk will be managed by providing adequate liquidity for short term cash needs, and by making longer-term investments only with funds that are not needed for current cash flow purposes. Certain types of securities, including variable rate securities, securities with principal pay-downs prior to maturity, and securities with embedded options, will affect the interest rate risk profile of the portfolio differently in different interest rate environments. The following strategies will be employed to control and manage adverse changes in the market value of the portfolio due to changes in interest rates:
 - a. Where feasible and prudent, investment maturities should be matched with expected cash outflows to manage market risk.
 - b. To the extent feasible, investment maturities not matched with cash outflows, including liquidity investments under one year, should be staggered to manage re-investment risk.
 - c. No commitments to buy or sell securities may be made more than 14 business days prior to the anticipated settlement date or receive a fee other than interest for future deliveries.

- d. The maximum percent of callable securities in the portfolio shall be 25%;
- e. The maximum stated final maturity of individual securities in the portfolio shall be five years, except as otherwise stated in this policy.
- f. The maximum portfolio average maturity (measured with stated final maturity) shall be 2.0 years.

INVESTMENT OF PROCEEDS FROM DEBT ISSUANCE

- 1. Investments of bond proceeds are restricted under bond covenants that may be more restrictive than the investment parameters included in this policy. Bond proceeds shall be invested in accordance with the parameters of this policy and the applicable bond covenants and tax laws.
- 2. Funds from bond proceeds and amounts held in a bond payment reserve or proceeds fund may be invested pursuant to ORS 294.052. Investments of bond proceeds are typically not invested for resale and are maturity matched with outflows. Consequently, surplus funds within the scope of ORS 294.052 are not subject to this policy's liquidity risk constraints within section IX (2).

INVESTMENT OF RESERVE OR CAPITAL IMPROVEMENT FUNDS

Pursuant to ORS 294.135(1)(b), reserve or capital Improvement project funds may be invested in securities exceeding three years when the funds in question are being accumulated for an anticipated use that will occur more than 18 months after the funds are invested, then, upon the approval of the governing body of the county, the maturity of the investment or investments made with the funds may occur when the funds are expected to be used.

GUIDELINE MEASUREMENT AND ADHERENCE

- 1. **Guideline Measurement.** Guideline measurements will use par value of investments.
- 2. Guideline Compliance.
 - a. If the portfolio falls outside of compliance with adopted investment policy guidelines or is being managed inconsistently with this policy, the Investment Officer shall bring the portfolio back into compliance in a prudent manner and as soon as prudently feasible.
 - b. Violations of portfolio guidelines as a result of transactions; actions to bring the portfolio back into compliance and; reasoning for actions taken to bring the portfolio back into compliance shall be documented and reported to the Board of County Commissioners.
 - c. Due to fluctuations in the aggregate surplus funds balance, maximum percentages for a particular issuer or investment type may be exceeded at a point in time. Securities need not be liquidated to realign the portfolio; however, consideration should be given to this matter when future purchases are made to ensure that appropriate diversification is maintained.

REPORTING AND DISCLOSURE

1. **Compliance.** The Investment Officer shall prepare a report at least monthly that allows the Board of County Commissioners to ascertain whether investment activities during the reporting period have conformed to the investment policy. The report will also be available online on the public website which will provide access for the investment advisory committee. The report will include, at a

minimum, the following:

- a. A listing of all investments held during the reporting period showing: par/face value; accounting book value; market value; type of investment; issuer; credit ratings; and yield to maturity (yield to worst if callable).
- b. Average maturity of the portfolio at period-end.
- c. Maturity distribution of the portfolio at period-end.
- d. Average portfolio credit quality of the portfolio at period-end.
- e. Average weighted yield to maturity (yield to worst if callable investments are allowed) of the portfolio.
- f. Distribution by type of investment.
- g. Transactions since last report.
- h. Distribution of transactions among financial counterparties such as broker/dealers.
- i. Violations of portfolio guidelines or non-compliance issues that occurred during the prior period or that are outstanding. This report should also note actions (taken or planned) to bring the portfolio back into compliance.
- 2. Performance Standards/ Evaluation. At least annually, the Investment Officer shall report comparisons of investment returns to relevant alternative investments and comparative Bond Indexes. The performance of the portfolio should be compared to the performance of alternative investments such as available certificates of deposit; the Oregon Short Term Fund; US Treasury rates; or against one or more bond indices with a similar risk profile (e.g., Bond indexes comprised of high grade investments and maximum maturities of three years).

When comparing performance, all fees and expenses involved with managing the portfolio shall be included in the computation of the portfolio's rate of return.

- 3. **Marking to Market.** The market value of the portfolio shall be calculated at least monthly and a statement of the market value of the portfolio shall be included in the monthly report.
- 4. **Audits.** Management shall establish an annual process of independent review by the external auditor to assure compliance with internal controls. Such audit will include tests deemed appropriate by the auditor.

POLICY MAINTENANCE AND CONSIDERATIONS

1. **Review.** The investment policy shall be reviewed at least annually to ensure its consistency with the overall objectives of preservation of principal, liquidity and return, and its relevance to current law and financial and economic trends.

The annual report should also serve as a venue to suggest policies and improvements to the investment program, and shall include an investment plan for the coming year.

- 2. **Exemptions.** Any investment held prior to the adoption of this policy shall be exempted from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested as provided by this policy.
- 3. **Policy Adoption and Amendments.** This investment policy and any modifications to this policy must be formally approved in writing by the Board of County Commissioners.

This policy must be submitted to the Oregon Short Term Fund (OSTF) Board for review if:

- a. This policy allows maturities beyond 18 months unless the funds are being accumulated for a specific purpose, including future construction projects, and upon approval of the Board of County Commissioners, the maximum maturity date matches the anticipated use of the funds (ORS 294.135(1)(b) and 294.135(3)).
- b. And either:
 - i. This policy has never been submitted to the OSTF Board for comment; or
 - ii. Material changes have been made since the last review by the OSTF Board.

Regardless of whether this policy is submitted to the OSTF Board for comment, this policy shall be resubmitted not less than annually to the Board of County Commissioners for approval.

Approved by the Board of Commissioners _	
Nick Lelack	
County Administrator	