



Sandoval County



Investment Policy

Date: May 14, 2025

Sandoval County Treasurer, Jennifer A. Taylor

Chief Deputy Treasurer, Jessica McParlin

Sandoval County Board of Commissioners

Amended Investment Policy

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INTRODUCTION:

Sandoval County was created in 1903 from the northern part of Bernalillo County. Its name comes from one of the large land-holding Spanish families in the area. The original county seat was in Corrales, but it was moved to Bernalillo in 1905. As of 2022, Sandoval County's population was 151,704, of that, 51.25% were between the ages of 25 to 64. 17.74% were of the ages 65 years of age or older. Today, Sandoval County encompasses 3,714 square miles of diverse geography and has a population of approximately 140,000 people. It includes the incorporated municipalities of Bernalillo, Cuba, Corrales, Jemez Springs, Rio Rancho and San Ysidro, as well as numerous unincorporated communities, and all or portions of seven Indian Pueblos and all or portions of six Tribal entities/lands.

I. RECITALS

A. SCOPE OF POLICY

The scope of this Policy is This Investment and Deposit Policy ("Policy") applies to all financial assets of Sandoval County ("County") including, but not limited to, the assets of the County's:

General
Funds Spending
Revenue Funds
Capital Projects Funds
Enterprise Funds
Debt Issuance Proceeds
Debt Service Funds
Debt Service Reserve Funds and Agency Funds

This policy outlines a system for the careful investment and deposit of County funds, while also improving the effectiveness of the County's cash management. A well-defined investment policy is critical for any public funds program.

Such a policy improves the quality of financial decisions and shows a dedication to managing public funds responsibly. It serves as a cornerstone for maintaining trust and ensuring accountability in handling taxpayer money.

As emphasized by Fiduciary Investment Advisor, a robust investment policy is the most important part of a public funds program. This importance stems from its role in guiding investment strategies and safeguarding public assets.

B. POLICY STATEMENT:

The scope of this policy is to manage County Funds in a manner that insures the safety of the investments and deposits, that provides for adequate liquidity and proper maturities that optimize investment and deposit income. It also serves to establish a

clear understanding between the County and any bank, savings bank, credit union, Fiduciary Investment Advisor and/ or professional fund manager utilized by the County as to the guidelines, limitations and directions that the County has determined appropriate for accounts under its purview. The County will use projected monthly cash receipts and outlays as a tool for maximizing available cash for investment and deposit purposes.

C. OBJECTIVES:

The primary objectives, in priority order, of the County's investment and deposit activities shall be:

1. Safety:

Safety of principal is a primary objective of the investment and deposit program. Investments and deposits of the County shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. To attain this objective, diversification is required in order that potential losses on individual securities and deposits do not exceed the income generated from the remainder of the portfolio.

2. Liquidity:

The County's investment and deposit portfolios will remain sufficiently liquid to enable the County to meet all operating requirements which might be reasonably anticipated, Future use of funds shall be a criterion in determining maturities for any investment or deposit.

3. Return on Investments and Deposits:

The County's various investment and deposit portfolios shall be designed with the objective of attaining at least a market rate of return throughout budgetary and economic cycles, considering the County's risk constraints and the cash flow characteristics of the portfolios.

II. INVESTMENT POLICY:

A. GOVERNING AUTHORITY:

The Board of County Commissioners acting in its capacity as the Board of Finance (BOF), has the authority to formulate an Investment Policy to give the County Treasurer

parameters of what investments are permissible.

B. DELEGATION OF AUTHORITY:

The County Treasurer has authority over the investment and deposit of public funds as outlined in this Policy. The Treasurer shall be responsible for all investment and deposit transactions and need not present investments or deposits to the BOF prior to making said investments and deposits, provided that the investments and deposits are in accordance with this Policy. A further requirement of this delegation of authority is that the Treasurer implements and maintains the system of controls outlined in the Policy in order to regulate investment and deposit activities. This policy is formulated based on §6-10-8 and §6-10-10, NMSA 1978.

C. PRUDENT PERSON RULE:

The prudence which is to be used by the Treasurer investing and depositing County funds shall be used in accordance with the provisions of Section §6-8-10, NMSA 1978 which states, "Investments shall be made with judgement 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."

D. ETHICS AND CONFLICT OF INTEREST:

1. Conflict of interest:

BOF members, the County Manager, the County Treasurer and any and all investment officials shall refrain from personal business activity that could conflict with the proper execution of the County's investment and deposit program or which could affect or impair their ability to make impartial decisions on behalf of the County §6-10-40 and §6-10-53, NMSA 1978 and the New Mexico Constitution Article v, Section 4.

2. Limit on receipt of gifts:

No individual responsible for the management of the Sandoval County investment portfolio or any member of the Sandoval County Investment Committee shall accept honoraria, gifts or gratuities from any advisor, broker, dealer, banker or other person with whom the Sandoval County Treasurer's Office conducts business, that aggregate in value in excess of \$25.00 in any fiscal year.

E. CASH MANAGEMENT:

The Commission and the Treasurer's Office shall jointly prepare and maintain an ongoing cash management program. This program will involve the preparation of a regular report that includes projections for cash receipts (revenues), cash disbursements (expenditures), and interest earned or estimated to be earned on overnight deposits and investments. The Commission directs the Finance Director to notify the County Treasurer monthly of County expenditures and of any large expenditures anticipated so that cash liquidity can be planned according to this monthly cash management report. The County Treasurer shall take into consideration these projected cash needs of the County when setting investment and deposit maturity dates. It shall be the duty of the Treasurer or their Authorized Designee to provide for adequate security for funds received, receipt and disbursement reports, and accounting of all cash and cash management activities. Cash management activities include bank balances, LGIP, and investments.

F. BANKS SELECTION AND PUBLIC MONEY DEPOSIT OF CERTAIN GOVERNMENT UNITS:

Public money may be deposited with banks, savings banks and credit unions having their main or manned branch offices within the geographical boundaries of the County, which have qualified as public depositories by reason of insurance of the account by an agency of the United States such as the Federal Deposit Insurance Corporation ("FDIC") or National Credit Union Share Insurance Fund ("NCUSIF") or by depositing collateral security as set forth in Section 13., Bank Deposits-Collateralized with Letters of credit from the Federal Home Loan Bank or by giving bonds as provided by law. However, a deposit made in any credit union shall not exceed that amount insured by an agency of the United States. (See §6-10-36C & 6-10-24A NMSA 1978)

1. Collateralization of Deposits:

The following guidelines shall be utilized to ascertain the level of collateral required from each local bank or savings bank and may be more constraining the NMSA 6.8. These ratios are in agreement with those set by the State Board of Finance for the State of New Mexico. The County reserves the right to set the level of collateral required based on criteria other than the ratios below. Written justification for the variance shall be kept on file in the County Treasurer's office. Should the institution's ratios result in a different collateral requirement for any of the ratios, the higher collateral level will be required.

The collateral level must be determined if the Treasurer chooses to reduce the collateral requirement to under 100%, the collateral level must be determined every six months. Each financial institution shall submit a current Statement of Financial Condition and a completed Risk Assessment Ratio Form to the Treasurer of the County.

Ratios	75%	100%
Primary Capital Assets	5.0%-6.0%	Less than 5.0%
6.Net Operating Income Total Average Assets	.51%- .61%	Less than .51%
Non-Performing Loans Primary Capital	35.0% - 49.9%	Above 49.9%

Approved collateral shall be any investment set forth in Section G. Investments herein, or letters of credit from the Federal Home Loan Bank or by pledging bonds as provided by law. (See §6-10- 36C, NMSA 1978).

Should the financial institution use a payment or performance bond, if provided by law, then the amount of collateralization shall be equal to the amount of the principal and accrued interest not otherwise covered by federal insurance. The maturity of deposits so collateralized shall be for the lesser of the term of the deposit or the time for cancellation of such payment or performance bond.

2. Collateral Security Agreement:

All banks, credit unions and savings banks in which County funds in excess of federal insurance are deposited will be required to enter into a Collateral Security Agreement which shall be mutually agreed upon by the Treasurer and the financial institution. (§6-10-18a, NMSA 1978)

G. AUTHORIZED INVESTMENTS (§6-10-10) and (§6-10-15 and 6-10-36:

The Treasurer may invest all sinking funds or money remaining unexpended from the proceeds of any issue of bonds or other negotiable securities of the County and all money not immediately necessary for the public uses of the County not invested or deposited in banks, savings and loan associations or credit unions in:

1.Non-Negotiable Certificates of Deposits: Public money placed in local bank and collateralized per 6-10-16 and 6-10-36 c and Section 12 herein.

- a) No security is required for the deposit of public money that is insured by the Federal Deposit Insurance Corporation or the National Credit Union

Administration.

- b) All securities shall be accepted as security at market value. The restrictions of Subsection A of this section apply to all securities subject to this subsection.

2. Bank Deposits – Collateralized: Public money placed in local bank and collateralized per 6-10-16 and 6-10-36 c.

- a) Deposits of public money shall be secured by:
 - i. Securities of the United States, its agencies or instrumentalities;
 - ii. Securities of the State of New Mexico, its agencies, instrumentalities, counties, municipalities or other subdivisions;
 - iii. Securities, including student loans, that are guaranteed by the United States or the State of New Mexico;
 - iv. Revenue bonds that are underwritten by a member of the Financial Industry Regulatory Authority, known as FINRA, and are rated “BAA” or above by a nationally recognized bond rating service; or
 - v. Letters of credit issued by a Federal Home Loan Bank
- b) No security is required for the deposit of public money that is insured by the Federal Deposit Insurance Corporation or the National Credit Administration.
- c) All securities shall be accepted as security at market value. The restrictions of Subsection A of this section apply to all securities subject to this subsection.

3. Federally Insured Products: Federally insured obligations that comprise multiple FDIC-insured bank deposits that the FDIC secures, including brokered certificates of deposit, certificate of deposit account registry service.

4. US Treasury Obligations: Securities that are issued and backed by the full faith and credit of the United States government; and

5. US Agency Obligations: issued by its agencies or instrumentalities, including securities issued by federal home loan banks, the Federal Home Loan Mortgage Corporation, the Federal National Mortgage Association, the Federal Farm Credit Banks Funding Corporation, the Federal Agricultural Mortgage Corporation or the Government National Mortgage Association and that have a maturity date that does not exceed ten years from the date of purchase insured cash accounts.

6. Municipal Bonds: Bonds or negotiable securities of the state of New Mexico, or a county, municipality or school district that has a taxable valuation of real property for the last preceding year of at least one million dollars (\$1,000,000) and that has not defaulted in the payment of any interest or sinking fund obligation or failed to meet any bonds at maturity at any time within five years last preceding and that have a maturity date that does not exceed ten years from the date of purchase; and

7. Supranationals: Which means an international development institution

formed by two or more central governments. "Supranational issuer" includes the International Bank for Reconstruction and Development, the International Finance Corporation and the Inter-American Development Bank.

Securities that are issued by supranational issuer and that:

- a) are eligible for purchase and sale within the United States;
- b) are denominated in United States dollars;
- c) have a maturity date that does not exceed five years from the date of purchase; and
- d) are rated "AA" or its equivalent or better by a nationally recognized statistical rating organization; and

8. Fixed Income Mutual Funds and Exchange-Traded Funds:

Shares of a diversified investment company registered pursuant to the federal Investment Company Act of 1940 that invests in fixed- income securities or debt instruments that passively match or track the components of a broad- market, fixed-income-securities market index; provided that the investment company or manager has total assets under management of at least one billion dollars (\$1,000,000,000) and provided that the Board of Finance of the county may allow reasonable administrative and investment expenses to be paid directly from the income or assets of these investments; and

9. State Investment Council Managed Funds:

Shares of pooled investment funds managed by the State Treasurer, as provided in Subsection I of Section 6-8-7 NMSA 1978; provided that the Board of Finance of the county may allow reasonable administrative and investment expenses to be paid directly from the income or assets of these investments and that in no case shall said investments be in equities or similar investments; and

10. Commercial Paper:

Commercial paper rated "A1" or "P1", also known as "prime" quality, by a nationally recognized statistical rating organization, issued by corporations organized and operating within the United States and having a maturity at purchase of no longer than one hundred eighty days; and

11. Money Market Funds:

Share of an open-ended diversified investment company that:

- a) is registered with the United States Securities and Exchange Commission
- b) complies with the diversification, quality, and maturity requirements of Rule 2a-7, or any successor rule, of the United States Securities and Exchange Commission applicable to money market mutual funds; and
- c) assesses no fees pursuant to Rule 12b-1, or any successor rule, of the United

- State Securities and Exchange Commission, no sales load on the purchase of shares and no contingent deferred sales charge or other similar charges, however designated, provided that the county shall not, at any time, own more than five percent of a money market mutual fund's assets; and
- d) This includes prime or government only; and

12. State LGIP: The LGIP, (Local Government Investment Pool,) (NMSA 1978 9-10-10.1); and

H. INVESTMENT SELECTION CRITERIA, MATURITY AND ASSEST ALLOCATION:

1. Maturity and Diversification Table

Issue Type	Maximum % Holdings	Maximum %per Issuer	Years to Maturity	Ratings S&P	Ratings Moody's
BANKING					
Non-Negotiable Certificates of Deposits	100%	20%	5 Years	NMSA Required collateral	NMSA Required collateral
Bank Deposits - Collateralized	100%	N/A	N/A	NMSA Required collateral	NMSA Required collateral
Federally Insured Products	50%	20%	5 Years	FDIC Limits	FDIC Limits
INVESTMENTS					
US Treasury Obligations	100%	N/A	10 Years	N/A	N/A
US Agency Obligations	100%	40%	10 Years	N/A	N/A
Municipal Bonds	20%	5%	10 Years	A-	A3
Supranationals (IBRD; IFC; IADB)	15%	5%	5 Years	AA	Aa2
Fixed Income Mutual Funds	20%	N/A	N/A	N/A	N/A
SIC Managed Funds	20%	N/A	N/A	N/A	N/A
Commercial Paper	25%	5%	180 Days	A1	P1

Money Market Funds	100%	N/A	N/A	AAAm	AAAm
LGIP	100%	N/A	N/A	AA	AA

2. Maturity Diversification Components:

- a. The maximum maturity of US Treasury, Agency, and Municipal fixed maturity securities purchased for an account cannot be greater than ten (10) years.
- b. The maximum maturity of certificate of deposit for an account cannot be greater than five (5) years.
- c. The maximum maturity of Supranational bond for an account cannot be greater than five (5) years.
- d. The maximum maturity of commercial paper for an account cannot be greater than one hundred eighty (180) days.
- e. The maturity schedule of any portfolio must take into account and reflect future cash needs and the goal of maximizing investment and deposit income, after providing for safety and liquidity.
- f. The average weighted maturity of any of the County portfolios shall be three (3) years.
- g. The following are prohibited investments and transactions:
 - i. Equities
 - ii. Mortgages
 - iii. Securities Lending

Maturity Constraints	Minimum % of Total Portfolio
Under 30 days	10%
Under 1 year	25%
Under 5 years	90%
Under 10 years	100%
Maturity Constraints	Maximum of Total Portfolio in Years
Weighted Average Maturity	3.0 years
Security Structure Constraint	Maximum % of Total Portfolio
Callable Agency Securities	25%

I. SCHEDULING OF INVESTMENT MATURITIES:

Investment and deposit maturities for cash balances shall be scheduled to coincide with projected cash flow needs when known, taking into account expenditures (payroll, debt-retirement payments, Capital Improvements Program disbursements) as well as considering anticipated revenue (property taxes, payment in lieu of taxes, etc.) utilizing the Cash Management program developed by the Treasurer. Idle funds that are not specifically dedicated to cash flow needs will be invested in a manner guided by this policy.

The County will create a program that will match investment and deposit funds with maturities when known. Such maturities may be either by fund or in aggregate, depending on market conditions, professional advice, other proposed financings or other matters that could have a positive or negative impact on rates of return.

Overall Strategy Portfolio Components:

Liquidity Component – Is primarily held at the bank in deposits or the State LGIP. These funds are available for daily cash needs.

Cash Matched Component- This portfolio is structured as a secondary tier to liquidity and invested in short-term investments under 1 year.

Core Investment Portfolio: This portfolio is structure to investment excess liquidity balances. This portfolio has a longer-term horizon and average maturity and is laddered in maturity between one day and five years.

In relation to bond proceeds, in order to comply with Internal Revenue Code Section 54A, in no case shall the final maturity of an individual security exceed three (3) years from the date of the issuance of the bonds creating the bond proceeds.

In the event that the proceeds have not been expended, the Treasurer or their Authorized Designee shall re- invest according to cash flow needs.

J. BOND ISSUES:

When the County issues debt, including loans and bonds, the Treasurer shall be incorporated into the negotiations as early as possible. The Treasurer may be required to sign certain debt documents, open segregated financial accounts for bond proceeds and possibly a debt service reserve fund. It will be incumbent on all parties representing the County to ensure that any debt proceeds are not commingled, and the Treasurer has ample time to review documents and prepare for the receipt or payment of funds. The Treasurer shall be notified of any transaction involving the receipt of or payment from bond proceeds as soon as such transactions are known to be needed.

K. CUSTODY OF SECURITIES:

All investment securities other than local financial institution Certificates of Deposit purchased by the County shall be held in third-party custody by an institution acceptable to the County. The custodial institution shall include contracted settlement terms in the custodial contract to ensure that the delivery versus payment standards are maintained. A listing of the specific instrument, rate, amount, maturity date, instrument number, and

other pertinent information will be provided with online access and via a monthly statement.. Securities shall be held in a segregated fund that is not commingled with the bank holdings. All securities will be settled based on delivery versus payment. This can be in a contracted settlement agreement with the bank.

Insurance such as Securities Investor Protection Corporation (SIPC) and private insurance shall be acceptable. The Treasurer or their Authorized Designee shall prepare the Safekeeping Report monthly.

L. INTERNAL CONTROLS:

The County Treasurer shall document and maintain a system of internal controls for the making of investments and deposits of County funds. The internal controls and compliance thereof shall be supplied and reviewed by independent auditors on an annual basis. The County Treasurer shall review the systems of controls periodically to ensure such controls are effective and that the County is complying with such controls. Any significant amendments will be presented at the Board of Finance meeting.

1. **Accounting Method:** The County shall comply with all required legal provisions and Generally Accepted Accounting Principles (GAAP). The accounting principles are those contained in the pronouncements of authoritative bodies including but not necessarily limited to, the Governmental Accounting Standards Board (GASB); the American Institute of Certified Public Accountants (AICPA); and the Financial Accounting Standards Board (FASB).
2. **Pooling of Funds:** Except for cash in certain restricted and special funds, the County may consolidate balances from all funds to maximize investment earnings. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting' principles.
3. **Performance Information:** The investment portfolio shall be designed to earn a market rate of investment income in relation to prevailing budgetary and economic cycles, while considering investment risk constraints and liquidity needs of the County. Given this strategy, the benchmark for investment considerations shall be a benchmark which reflects the prominent and persistent characteristics of the portfolio over time. The benchmark may be adjusted periodically as material changes take place in regard to asset allocation and/or weighted average maturity.
4. **Ongoing Training and Education:** The County recognizes the importance of continuous learning for its investment staff. By providing access to relevant training and educational programs, the County aims to enhance the expertise and capabilities of its personnel. This proactive approach to professional development supports sound investment decisions and responsible financial stewardship. Ultimately, the County's investment in its staff's professional growth reflects its

dedication to safeguarding public funds. It demonstrates a commitment to excellence in financial management and ensures the County adheres to the highest ethical and professional standards. This benefits both the County and its citizens through responsible and effective investment practices.

5. **Internal/External Audit:** The custodian/safekeeping account, investment transactions, and records may be audited by outside independent auditors on an annual basis prescribed by the NM State Auditor's Office (OSA). The results of that audit shall be furnished to the Sandoval County Board of Commissioners, acting as the Board of Finance.

M. INTERNAL REPORTS:

A detailed investment report shall be compiled monthly by the County's Treasurer or their Authorized Designee and published along with the Treasurer's Monthly Treasurer's Report.

N. COMMUNICATIONS AND REPORTS TO TREASURER OR THEIR AUTHORIZED DESIGNEE:

Any Fiduciary Investment Advisor, professional fund manager or third party custodians required pursuant to Section N of this Policy actively doing business with the County must submit to the Treasurer or their Authorized Designee in a timely manner, investment reports showing total amount invested, cost basis and market value of each security, amount invested in each type of security, maturity schedule of the portfolio, yield and cash flow analysis of the portfolio, the time weighted return for each reporting period, the weighted average maturity (WAM) or duration, where applicable, and other items as determined by the Treasurer. Any transactions that occurred during the reporting period should be shown as well as any realized gains or losses.

Any Fiducially Investment Advisor must also provide the Treasurer with the end of fiscal year report in a format specified or approved by the Treasurer and shall be submitted within a timely manner. Any Fiducially Investment Advisor must also submit a performance evaluation of any fund manager(s) other than themselves used in the portfolio he/she manages to the Treasurer within a timely manner.

Any Fiduciary Investment Advisor must provide any and all documentation that is needed to fulfill the requests of the county or state auditor within a timely manner.

O. COMMUNICATIONS AND REPORTS TO THE BOARD OF FINANCE:

The Treasurer or their Authorized Designee will strive to submit the Treasurer's Report to

the BOF and the County Manager by the 25th of each month. The Treasurer's Report will include the investment statement summary. In addition, the Treasurer will submit to the BOF and the County Manager, the Fiduciary Investment Advisor's presentation, at least three days before the scheduled quarterly meeting. The investment presentation will show total amount invested, cost basis and market value of each security, amount invested in each type of security, maturity schedule of the portfolio, yield and cash flow analysis of the portfolio, the time weighted return for each reporting period and the third-party custodian report. Any transactions that occurred during the reporting period should be shown. The reports of any Fiduciary Investment Advisor or third-party custodian required in herein shall satisfy this requirement if received.

Presentations by any Fiduciary Investment Advisor to the BOF may include views on developments within the national/local economies, the securities markets and the potential effects of these developments on investment strategy, portfolio maturities, potential amendments to this Policy and other fiscal matters.

P. FIDUCIARY INVESTMENT ADVISOR:

1. Is a fiduciary for County assets, is licensed and registered as a Registered Investment Advisor (RIA) under the Investment Advisor's Act of 1940, as amended:
 - a. A Registered Investment Advisor (RIA) is an advisor or firm engaged in the investment advisory business and registered with the Securities and Exchange Commission (SEC); and
 - b. Is a fiduciary in which they must make decision in the best interested of the County; always put the County's interest before their own; and, act prudently; and
2. an investment firm with expertise in the management of investment portfolios; and
3. has had at least seven (7) years' experience in managing investments approved herein for other governments and fiduciary institutions and has at least \$1,000,000,000 under management for investment disciplines similar to this Policy; and
4. does not have a proprietary interest in any fund manager utilized by the County; and
5. has the ability to buy and sell securities and assist in trade settlement through a non-proprietary third-party trading desk; and shall not purchase, sell or transfer to and from their own inventory; and
6. has liability and fiduciary insurance coverage sufficient to the County Treasurer; and
7. agrees to advise the County Treasurer in writing of any significant changes in the investment philosophy, management style, ownership, organizational structure, financial condition or senior personnel staffing of the fund manager or manager assigned to the County within 30 days of each change; and
8. is compensated only on a fee (agent only) basis and does not receive commissions,

- mark-ups or other compensation on securities purchased for the County; and
9. agrees to present to the BOF at the request of the Treasurer. The Fiduciary Investment Advisor's report must include all items included in Section P herein and given to the Treasurer at least five (5) business days before a scheduled BOF meeting; and
 10. is required to attend the Sandoval County Investment Committee (SCIC) quarterly meetings (telephonic attendance may be acceptable for this purpose if approved by the Treasurer); and
 11. agrees to the communications requirements herein; and
 12. agrees to be bound by this Policy.

Concurrent with the 2013 rule released by the Securities and Exchange Commission (SEC) on the registration of Municipal Advisors (MA), including the operational guidance, Sandoval County will maintain the separation of duties between Municipal Advisors and Professional Fiduciary Investment Advisors to prevent business practice of working with government finances for private gain and to promote transparency of taxpayer dollars.

The Fiduciary Investment Advisor's rate of return shall be measured against their peers and benchmarks established by the Sandoval County Investment Committee (SCIC) which shall mirror the limitations of this Policy and their performance shall be evaluated based on the lesser of a 3-5-year time period or a complete market cycle. A copy of this Policy shall be given to the Professional Fiduciary Investment Advisor. It shall be fully understood by any Fiduciary Investment Advisor that they are retained by the County and report to the County Treasurer.

O. INVESTMENT BROKERS:

All transactions are to be governed by negotiation on a "best realized price" (best net price) basis. Mark-ups on each trade, if any and commissions charged shall be provided to the County on trade confirmations submitted by the brokerage firm. As electronic trading is the recognized source of obtaining the best realized price, all brokerage transactions shall be conducted on a nationally accredited electronic trading platform and be subject to the best realized price condition.

If an investment advisor is contracted to provide securities transactions on behalf of the County, the advisor's approved broker/dealer list will be provided to the County for approval. Buys and sells may be transacted with any dealers on the advisor's approved list. The Treasurer may assign the responsibility of broker/dealer due diligence and licensing documentation to the Advisor; it must be available upon request.

R. COMPETITIVE TRANSACTIONS:

1. The Treasurer 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.
2. In the instance of a security for which there is no readily available competitive bid or offering on the same specific issue, then the Treasurer shall document quotations for comparable or alternative securities.
3. When purchasing original issue instrumentality 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 Treasurer or their Authorized Designee is encouraged to document quotations on comparable securities.
4. If an investment advisor provides investment management services, the advisor must retain documentation of competitive pricing execution on each transaction and provide upon request.

S. INVESTMENT COMMITTEE:

The Treasurer and Commission have established a Sandoval County Investment Committee (SCIC) or "Investment Committee." The purpose of this committee is to establish a formal process to plan, prepare and manage the county investment strategy for all county funds in discussion with county representatives and the community. Discussion topics include: the political and market environment; quarterly transactions; upcoming or future liquidity needs; annual review of the investment policy; and overall discussion of the county portfolio. The Investment Committee may make recommendations to help ensure that proper controls are in place to guarantee the integrity and security of the County Investment Portfolio.

The Treasurer is the Chairperson of the SCIC; presents quarterly reports and asks for guidance or input from committee members. The SCIC is an advisory committee and participation is voluntary for all members.

The SCIC is comprised of the County Treasurer, County Manager, County Finance Director, at least one member of the County Commission, who shall be named by the County Commission, three community members which are residents of the County who have experience in investment and deposit topics, and the Deputy Treasurer and Treasury Operations Manager from the Treasurer's Office. Two of the community members are appointed by the County Treasurer and one community member is appointed by the Commission. A representative from the County Bank with whom they are under contract with and the County Financial Advisor may attend as advisory members.

The Investment Committee may make recommendations regarding this Policy and related

matters to the Treasurer.

Voting on all action items will require a quorum, defined as the presence of at least 50% of the committee members.

The SCIC meets quarterly and its meeting dates are established by the Treasurer and acknowledged by the County Commission during the first meeting of the New Year and are placed in the County calendar. The meetings are open to the public.

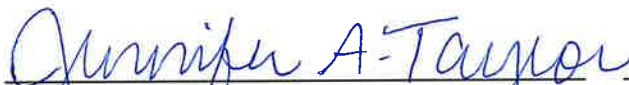
T. AMENDMENTS:


This Policy may be revised by the BOF as it deems appropriate. It shall be the obligation of the Treasurer to bring such amendments to the BOF and obtain the approval of their majority before such changes and amendments take effect. The investment policy shall be reviewed at least every two years.

IN WITNESS WHEREOF the parties have hereunto set their hands and seals this day and year first above written.

SANDOVAL COUNTY TREASURER:

SANDOVAL COUNTY COMMISSION:



Jennifer A. Taylor, County Treasurer


Michael Meek, Chairman

ATTEST:


Jordan Juarez, Vice Chairman


Anne Brady-Romero, County Clerk


Katherine A. Bruch, Member


Jon Herr, Member


Joshua Jones, Member



APPROVED AS TO FORM:

Wm. J. F. Smith

