



Comprehensive Financial Management Policies

Figure 11c Investment Policy

Revised: December, 2010

Objectives

This policy sets forth criteria for the operation of the investment portfolio. It will be recognized that the primary objective of the Investment Policy is to establish a conservative set of investment criteria that will prudently protect Bellevue's (hereafter referred to as the City) principal sums and enable the City to generate a market rate of return from its investment activities while assuring adequate liquidity to meet its cash flow needs. All investment activity will be in compliance with RCW 35A.40.050 "Fiscal - Investment of Funds" and any other statutes or regulatory requirements, such as Internal Revenue Codes, which may apply.

Scope

This policy guides the investment of all available City funds except it does not include assets held in escrow in order to defease refunded debt, nor does it include retirement funds managed by others such as the state, the Municipal Employees Benefit Trust, and deferred compensation plan providers.

Responsibility

Authority to manage the investment program is derived from Bellevue City Code Section 3.37.060. This section gives the Finance Director authority to determine the amount of money available in each fund administered by the City for investment purposes, and the authority to invest such moneys in all forms of investments that are authorized by law. This section also authorizes the Director to designate a subordinate employee(s) to assist in the performance of these duties.

The Finance Director will provide a letter(s) of authorization to individuals or firms on the approved broker/dealer list specifically designating City staff who have the authority to commit the City to investment transactions.

The Finance Director or his/her designee will establish written investment procedures including a glossary of investment terms for the operation of the investment program, consistent with this investment policy.

Types of Investment and Diversification

The City may invest in any of the securities identified as eligible investments as defined by RCW 35A.40.050 "Fiscal - Investment of Funds". For purposes of this policy, the major eligible investment categories have been further restricted as follows:

1. United States Treasury Debt Obligations
 - Maximum % of Portfolio 100%
 - Maximum Remaining Maturity 5 years
 - Securities will be held by the City's third party custodian in the City's name.

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2. United States Agency Securities backed by the full faith and credit of the United States Government for the payment of principal and interest
 - Maximum % of Portfolio 100%
 - Maximum Remaining Maturity 5 years
 - Maximum % of Portfolio Per Issuer 25%
 - Defined by RCW 43.84.080 to include certificates, notes, or bonds of the United States, or other obligations of the United States or its agencies, or of any corporation wholly owned by the government of the United States.
 - Does not allow investments in derivatives or securities that derive value and/or yield from an underlying asset unless they fall into one of the following categories: 1) agency obligations that float with interest rates or external indexes such as CMT index, treasury bills, LIBOR, Prime rate and Fed Funds rate; 2) agency security obligations that have call features; and 3) agency security obligations that have step-up features at pre-determined intervals.
 - Interest only and principal only mortgage backed securities, inverse floaters and collateralized mortgage obligations are excluded.
 - Securities will be held by the City's third party custodian in the City's name.

3. United States Agency Coupon Securities (Mortgage-backed Securities Included)
 - Maximum % of Portfolio 100%
 - Maximum Remaining Maturity 5 years
 - Maximum % of Portfolio Per Issuer 25%
 - Defined by RCW 43.84.080 to include obligations of any United States government-sponsored corporation whose obligations are eligible as collateral for advances to member banks as determined by the Board of Governors of the Federal Reserve System.
 - Does not allow investments in derivatives or securities that derive value and/or yield from an underlying asset unless they fall into one of the following categories: 1) agency obligations that float with interest rates or external indexes such as CMT index, treasury bills, LIBOR and Fed Funds rate; 2) agency security obligations that have call features; and 3) agency security obligations that have step-up features at pre-determined intervals.
 - Interest only and principal only mortgage backed securities, inverse floaters and collateralized mortgage obligations are excluded.
 - Securities will be held by the City's third party custodian in the City's name.

4. United States Agency Discount Notes
 - Maximum % of Portfolio 100%
 - Maximum Remaining Maturity 1 year
 - Maximum % of Portfolio Per Issuer 25%



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- Defined by RCW 43.84.080 to include obligations of any United States government-sponsored corporations whose obligations are eligible as collateral for advances to member banks as determined by the Board of Governors of the Federal Reserve System.
 - Securities will be held by the City's third party custodian in the City's name.
5. FDIC Guaranteed Senior Unsecured Debt Obligations – TLGP (Treasury Liquidity Guaranty Program) and other federal government guaranteed programs
- Required Investment Rating AAA/Aaa long-term and A-1/ P-1 short-term
 - Maximum % of Portfolio 100%
 - Maximum Remaining Maturity expiration Not to exceed the lesser of the date of FDIC's guarantee or 5 years
 - Maximum % of Portfolio Per Issuer 5%
 - To be eligible for purchase, the obligations must: 1) be guaranteed by the FDIC, and 2) carry the full faith credit of the United States Government.
 - The note obligations must be issued by corporations organized and operating in the United States.
 - Securities will be held by the City's third party custodian in the City's name.
6. Repurchase Agreements secured by United States Government and United States Agency Debt Obligations
- Maximum % of Portfolio 50%
 - Maximum % of Portfolio With any Primary Dealers or Financial Institutions 10%
 - Maximum Remaining Maturity 60 days
 - Maximum Remaining Maturity of Underlying Collateral 5 years
 - Collateral Pricing Daily
 - All US Government Agency collaterals should stay within the 25% per issuer limit.
 - Collateral equal to 102% of the repurchase agreement must be delivered to the City's third party custodian if less than 30 days. If the repurchase agreement is between 30-60 days, collateral equal to 105% of the repurchase agreement must be delivered to the custodian.
 - Securities will be purchased from primary dealers or financial institutions that are members of the Washington Public Depository under a written Master Repurchase Agreement.
 - Only US Treasury, US Government Agency, and US Government Sponsored Corporation securities may be accepted as collateral.



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- Collateral securities will be held by the City's third party custodian, or through a tri-party arrangement in the City's name.
7. Certificates of Deposit, and other Interest Bearing Bank Deposits with financial institutions recognized by the State of Washington Public Deposit Protection Commission (PDPC) as qualified to hold public deposits.
- Maximum % of Portfolio 50%
 - Maximum Remaining Maturity 1 year
 - Maximum % of Portfolio Per Issuer 10%
8. Bankers Acceptances purchased on the secondary market
- Required Investment Rating Rated in the highest tier (e.g., A-1, P-1, F-1 or better) of the accepting bank's short-term obligations by any two nationally recognized statistical rating organizations
 - Maximum % of the Portfolio 15%
 - Maximum Remaining Maturity 6 months
 - Maximum % of Portfolio Per Issuer 5%
 - Securities will be held by the City's third party custodian in the City's name.
9. Commercial Paper Issued by United States Corporations in compliance with the provisions adopted by the State Investment Board RCW 43.84.080 (7).
- Required Investment Rating Rated in the highest tier (e.g., A-1, P-1, F-1 or better) by any two nationally recognized statistical rating organizations
 - Maximum % of Portfolio 15%
 - Maximum Remaining Maturity 90 days
 - Maximum Percent of Portfolio Per Issuer 5%
 - Securities will be held by the City's third party custodian in the City's name.
10. State of Washington Local Governmental Investment Pool
- Maximum % of Portfolio 100%
 - A copy of the pool's investment policy must be obtained and reviewed.

The portfolio and issuer limits listed above shall be complied with at the time of a security purchase. However, no sale of securities shall be required to meet revised limits due to a decrease in the total size of the portfolio.



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Weighted Average Duration and Liquidity

The total portfolio (including short-term money market and cash accounts) will be managed such that the weighted average modified duration does not exceed 2.5 years.

The portfolio should be laddered with staggered maturities to assure that: 1) adequate resources are available to meet cash flow requirements without forced liquidation of investments, and 2) price volatility and reinvestment risks are minimized.

Prudence

“Investments shall be made with the same judgement and care which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering probable safety of their principal as well as probable income to be derived.”

The standard of prudence to be used by employees authorized to commit the City to investment transactions shall be the "prudent person" standard. Employees meeting the prudent person standard shall be relieved of personal responsibility for an individual security's subsequent performance, provided appropriate action is taken to control adverse developments.

Performance

The portfolio shall be managed to obtain a market rate of return through budgetary and economic cycles, keeping in mind the primary objectives of protecting the City's capital and assuring adequate liquidity to meet cash flow needs.

For purposes of this policy, the market rate of return objective will be the 12-month moving average yield of the U.S. Treasury 2-year Constant Maturity Index for the period of time being evaluated. The goal is for the portfolio to generally perform above the Index.

Ethics and Conflicts of Interest

Employees involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions. These employees shall disclose to the City Manager and Finance Director any material financial interests in financial institutions that conduct business within this jurisdiction, and they shall further disclose any large personal financial/investment positions that could be related to performance of the City's portfolio, particularly with regard to the time of purchases and sales. Employees shall subordinate their personal investment transactions to those of the City.

Authorized Financial Dealers/Institutions and Financial Review

The Finance Director will approve financial institutions to be eligible to conduct investment business with the City. A current list of approved brokerage firms will be maintained by the Finance Director or his/her designee. This list may include primary dealers (government securities reporting to the Market Reports Division of the Federal Reserve Bank of New York), regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capitalization), and national banks.

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To become authorized to provide investment services to the City, each institution must provide an annual letter to the City from the individual providing the service certifying that he or she has read the City's investment policy and assures that all transactions with the City will fall within the policy boundaries. This letter shall also certify that the firm and broker assigned to this account have the required credentials and licenses with the NASD, SEC or appropriate agencies and that they must immediately notify the City if at any time the firm or broker is not in compliance with SEC rule 15C3-1, the firm's capital position falls short of the Capital Adequacy or uniform Net Cap Rule standard, or a material control weakness is identified by the firm's independent auditor. In addition, each institution must also provide the City with a copy of their annual audited financial report or Consolidated Report of Condition (call report).

In the case of certificates of deposit, those financial institutions recognized by the PDPC (Public Deposit Protection Commission) are qualified to hold public deposits.

An annual review of the audited financial report or call report of the selected qualified financial institutions will be conducted by Finance staff.

Broker Allocation

Investment transactions will be based upon the financial institution or brokerage firm that offers the best price to the City on each particular transaction. The City will make its best effort to obtain three bids for purchase or sale of government agency securities other than new issues. If circumstances dictate fewer than three bids due to the volatility of the market place, lack of bids, etc., the Finance Director, Assistant

Finance Director or the Treasury Manager has the authority to waive this rule. Generally not all brokers will have the same inventory of agency securities available to sell, but should be able to offer comparable alternatives. Treasury security transactions will be accomplished at or within the bid or asked price spread indicated on the live Bloomberg screens or similar reliable real time investment information service. Issues not actively traded on such services will be subject to the three bid requirement. Bankers Acceptances and Certificates of Deposit (other than a compensating balance CD) also require the acquisition of at least three bids, and acceptance of the most attractive rate from among comparable alternatives. Where two or more institutions or brokers have offered the same low bid, allocation will go to the lowest bidder that has provided the best service to the City.

Custody

All security transactions, including collateral for repurchase agreements, entered into by the City shall be conducted on a delivery versus payment (DVP) basis. Securities will be held by a third party custodian designated by the Finance Director or his designee as evidenced by confirmations in the City's name.

Investment Committee

An Investment Committee will be established by the City Manager, and will include at least three members from the business community knowledgeable in the area of institutional investment management. This Committee will periodically meet to review the investment



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program and make recommendations to the Finance Director with regard to proposed changes to the investment policy.

Internal Control

Investment procedures will be defined, documented, and implemented by the Finance Director or his/her designee to assure adequate internal control of the investment process.

The Finance Director or his/her designee will establish a process of periodic independent review by an external auditor or competent staff not assigned to the investment function.

The Washington State Auditor's Office will customarily conduct independent annual reviews of the investment function.

Reporting

Investment reports will be prepared and provided at least quarterly to meet the needs of the users including sufficient detail to provide an accurate and meaningful representation of the portfolio, showing its performance in relation to established benchmarks and its compliance with the investment policy.

Policy Adoption

The Investment Policy is adopted by the City Council as part of the biennial budget. The Finance Director has authority to approve changes to this Investment Policy.

Summary of Changes to the City's Investment Policy

1. Actual reference and link to the RCW and the City Code added.
2. Added United States Agency Securities backed by the full faith and credit of the US Government (e.g., Government National Mortgage Association "Ginnie Mae" Small Business Association "SBA") as a separate eligible investment category. These securities were not specifically identified as eligible investments in the prior version of the Policy.
3. Introduced investments in agency obligations that float with interest rates or external indexes such as CMT index, treasury bills, LIBOR, Prime rate and Fed Funds rate to the Policy. Provided additional diversification and enhance total return.
6. FDIC Guaranteed Senior Unsecured Debt Obligations – TLGP (Treasury Liquidity Guaranty Program) and other federal government guaranteed programs added to the Policy. These high quality investment instruments provide higher return while holding credit ratings comparable with Treasuries.
7. The Maximum percentage of Bankers Acceptances (BAs) purchased on the secondary market was reduced from 50% to 15% percent; and maximum percent per issuer was reduced from 10% to 5%. These changes were made mainly to minimize the risk exposure to BAs as a result of recent financial institute failures.

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8. The maximum period/remaining maturity allowed investing in US Treasury debt obligations were reduced from 5.5 years to 5 years. This change was made primarily to make investments in Treasuries consistent with Agency securities.
9. The portfolio's performance measure was changed from "a band between the average yield of the ninety-day Treasury bill and the 2-year Treasury note" to "12-month moving average yield of the U.S. Treasury 2-year Constant Maturity Index"

Reasons for this change include:

- Due to the change in the final maturity of agencies from 2-5 years in the last 3 years.
- To raise the bar by increasing the standard from the band (90 – 2 years) to the upper range of 2-year Treasury.
- Moving average is a better measure than a snapshot at end of a period reducing volatility and closely mirrors actual portfolio activities In line with GFOA's best practice and other governments in Washington – consistent with duration.



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Revised: October 2012

Background

The City of Bellevue (City) maintains conservative financial policies to assure strong financial health both in the short- and long-term. The City is an infrequent issuer of debt with debt primarily used as a tool to finance large capital investments such as property acquisitions.

Maintaining the City's bond rating is an important objective of the City's financial policies. To this end, the City is constantly working to improve its financial policies, budgets, forecasts, and financial health.

Purpose

This policy sets forth the criteria for issuance and repayment of debt. The primary objective of the Debt Policy is to establish criteria that will protect the City's financial integrity while providing a funding mechanism to meet the City's capital needs. The underlying approach of the City is to borrow only for: 1) capital improvements that cannot be funded on a pay-as-you-go basis, and 2) extraordinary circumstances where Councilmanic or voted long-term debt has been issued to achieve major City goals that otherwise could not have been achieved, or would have to be delayed for an unacceptable amount of time. The City will not issue long-term debt to finance current operations.

All debt issued will be in compliance with this policy, Bellevue City Code (BCC) Chapter 2.30 - Registration Procedure for Bonds and Obligations, Chapter 35A.40 Revised Code of Washington (RCW) - Fiscal Provisions Applicable to Code Cities and Chapter 43.80 RCW - Fiscal Agencies along with all other City, State, and Federal laws, rules, and regulations.

Scope

This Policy provides general guidance for the issuance and management of all City debt. In addition, it includes the management of all debt absorbed by the City through utility assumptions or the like. It does not include the debt issued by the Bellevue Convention Center Authority.

Responsibility

Authority to issue and manage debt is derived from BCC 2.37.030. This section gives the Finance Director authority to act in the capacity of City Treasurer, which includes the duties of debt management.

This section also authorizes the Finance Director to appoint a subordinate employee from the Department to assist in the performance of the duties of City Treasurer. The Finance Director has appointed the Investment and Debt Manager to act as the Debt Manager to assist in the duties of debt issuance, interest payments, principal repayments and other debt-related activities.

The Finance Director is responsible for assuring that the activities related to the issuance and payment of bonds or other obligations not jeopardize the bond rating.

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Budgeting and Capital Planning

The City shall develop and maintain a capital planning process such as the biennial Capital Investment Program Plan for consideration and adoption by the City Council as part of the City's budget process. The Finance Department is responsible for coordinating and analyzing the debt requirements. This will include timing of debt, calculation of outstanding debt, debt limitation calculations and compliance, impact on future debt burdens, and current revenue requirements.

Prior to issuance of debt, the City will prepare revenue projections, such as the biennial budget or the Financial Forecast, to ensure that there is adequate revenue to make principal and interest payments.

Types of Long-Term Debt

The following is a description of the types of long-term debt the City may issue:

1. General Obligation

This debt is backed by the full faith and credit of the City. The State RCW limits this debt to 2.5% of the assessed valuation of the City for each of three purposes:

a. General Purposes

Debt issued in this category can be used for any purpose allowed by law.

Non-Voted

The City Council may authorize the issuance of general obligation debt up to 1.5% of the City's assessed value without a vote of the public as long as there is an available source of funding to pay the debt service. This funding source can be the diversion of an existing revenue source or a new revenue coming from the enactment of a new tax or other revenue source. The debt can take the form of bonds, bond anticipation notes, lease-purchase agreements, conditional sales contracts, certificates of participation, or other forms of installment debt.

Voted

The City Council may place any general obligation debt issue before the electorate. According to State law, if a debt issue is placed before the City's electorate, it must receive a 60% or greater yes vote and have a turnout of at least 40% of those voting at the previous general election. Voted issues are limited to capital purposes only.

b. Open Space and Parks

Debt issued in this category must be used for park and open space and/or recreation facilities. All debt in this category must be approved by the voters.

c. Utilities

Debt issued in this category must be used for utility infrastructure. All debt in this category must be approved by the voters.

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2. Revenue Debt

Revenue bonds are generally payable from a designated source of revenue generated by the project which was financed. No taxing power or general fund pledge is provided as security. Unlike general obligation bonds, revenue bonds are not subject to the City's statutory debt limitation nor is voter approval required.

3. Local Improvement District (LID) Debt

LID bonds are payable solely from assessments of property owners within the local improvement district. Similar to revenue debt, no taxing power or general fund pledge is provided as security, and LID bonds are not subject to statutory debt limitations.

The debt is backed by the value of the property within the district and a LID Guaranty Fund. The LID Guaranty Fund is required by State law.

4. Other Financing Contracts and Loan Programs

- a. Lease purchase or financing contracts are payment obligations that represent principal and interest components for which the City receives the property after all payments are made.
- b. Local Option Capital Asset Lending (LOCAL) Program is available for use by the City through the Office of the State Treasurer under RCW 39.94. It is a financing program that allows pooling by the State equipment financing and certain real estate project needs into larger offerings of securities, and allows local government agencies the ability to finance equipment or real estate needs through the State Treasurer's Office subject to existing debt limitations and financial considerations.
- c. Public Works Trust Fund Loans are loans from the Public Works Board, authorized by state statute, RCW 43.155 to provide low interest loans, on a competitive basis, to help local governments address critical infrastructure needs for water, stormwater, roads, bridges, and solid waste/recycling systems.

Short-Term Debt and Interim Financing

The City may utilize short-term borrowing in anticipation of long-term bond issuance or to fund cash flow needs in anticipation of tax or other revenue sources.

In accordance with BCC 3.37.070, the Finance Director is authorized to make loans from one City fund to another City fund for periods not exceeding six months. The Finance Director or designee is required to assure that the loaning fund will have adequate cash balances to continue to meet current expenses after the loan is made and until repayment from the receiving fund.

Limitation of Indebtedness

In addition to the limitations required by the RCW, the City's indebtedness is further limited by this policy to assure strong financial health. The limitations are applied to the assessed value of the City to arrive at a dollar value of indebtedness. For example, the 2011 assessed valuation used to determine the 2012 property tax levy was \$30.98 billion, and the statutory limitation for general obligation debt is 2.5%. Therefore, the City's

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statutory debt limitation is \$774.4 million. The following matrix shows the general limitation by type of debt. These limitations may be modified by the City Council up to the statutory limitation at the Council’s discretion.

Type of Debt	Statutory Limitations	Policy Limitations	2012 Bellevue Actual
General Obligation:	2.5%	1.75%	0.61%
Non-Voted	1.5%	1.0%	0.61%
Voted	1.0%	0.75%	0.00%
Open Space and Parks	2.5%	1.75%	0.00%
Utilities	2.5%	1.75%	0.00%
Revenue	no limit	no limit *	NA
Local Improvement District	no limit	no-limit *	NA

* Revenue and LID debt is not limited because no taxing power or general fund pledge is provided as security.

Structure and Term of Debt

1. Debt Repayment

The City shall pay all interest and repay all debt in accordance with the terms of the bond ordinance. The maturity of bonds issued should be the same or less than the expected life of the project for which the bonds were issued. To the extent possible, the City will seek level or declining debt repayment schedules.

2. Variable-Rate Securities

When appropriate, the City may choose to issue securities that pay a rate of interest that varies according to a pre-determined formula or results from a periodic remarketing of the securities. However, the City will avoid over use of variable-rate debt due to the potential volatility of such instruments.

Professional Services

The City’s Finance Department shall be responsible for the solicitation and selection of professional services that are required to administer the City’s debt program.

1. Bond Counsel

All debt issued by the City will include a written opinion by bond counsel affirming that the City is authorized to issue the proposed debt. The opinion shall include confirmation that the City has met all city and state constitutional and statutory requirements necessary for issuance, a determination of the proposed debt’s federal income tax status and any other components necessary for the proposed debt.

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2. Financial Advisor

A Financial Advisor(s) will be used to assist in the issuance of the City's debt. The Financial Advisor will provide the City with objective advice and analysis on debt issuance. This includes, but is not limited to, monitoring market opportunities, structuring and pricing debt, and preparing official statements of disclosure.

3. Underwriters

An Underwriter(s) will be used for all debt issued in a negotiated or private placement sale method. The Underwriter is responsible for purchasing negotiated or private placement debt and reselling the debt to investors. Underwriter(s) will also be used for a competitive sale method. Under a competitive sale, underwriters will submit proposals for the purchase of the new issue of municipal securities electronically and the securities are awarded to the underwriter presenting the lowest true interest cost (TIC) according to stipulated criteria set forth in the notice of sale.

4. Fiscal Agent

A Fiscal Agent will be used to provide accurate and timely securities processing and timely payment to bondholders. In accordance with Chapter 43.80 RCW, the City will use the Fiscal Agent that is appointed by the State.

5. Other Service Providers

The Finance Director will have the authority to periodically select other service providers (e.g., escrow agents, verification agents, trustees, arbitrage consultants, etc.) as necessary to meet legal requirements.

Method of Sale

The City will generally issue its debt through a competitive process but may use a negotiated process under the following conditions.

- The bond issue is, or contains, a refinancing that is dependent on market/interest rate timing.
- At the time of issuance, the interest rate environment or economic factors that affect the bond issue are volatile.
- The nature of the debt is unique and requires particular skills from the underwriter(s) involved.
- The debt issued is bound by a compressed time line due to extenuating circumstances such that time is of the essence and a competitive process cannot be accomplished.

Credit Ratings

The City will maintain good communication with bond rating agencies about its financial condition. This effort will include providing periodic updates on the City's general financial condition, coordinating meetings, and presentations in conjunction with a new issuance. The City will continually strive to maintain the highest possible bond ratings by improving financial policies, budgets, forecasts and the financial health of the City.



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Credit enhancements may be used to improve or establish a credit rating on a City debt obligation. Credit enhancements should only be used if cost effective.

Refunding Debt

A debt refunding is a refinance of debt typically done to take advantage of lower interest rates. Unless otherwise justified, such as a desire to remove or change a bond covenant, a debt refunding will require a present value savings of three percent of the principal amount of the refunding debt being issued.

Investment of Bond Proceeds

The City will comply with all applicable Federal, State and Contractual restrictions regarding the investment of bond proceeds including the City of Bellevue Investment Policy.

Arbitrage Rebate Monitoring and Reporting

The City will, unless otherwise justified, use bond proceeds within the established time frame pursuant to the bond ordinance, contract or other documents to avoid arbitrage. Arbitrage is the interest earned on the investment of the bond proceeds above the interest paid on the debt. If arbitrage occurs, the City will pay the amount of the arbitrage to the Federal Government as required by Internal Revenue Service Regulation 1.148-11. The City will maintain a system of recordkeeping and reporting to meet the arbitrage rebate compliance requirement of the IRS regulation. For each bond issue not used within the established time frame, the recordkeeping shall include tracking investment earnings on bond proceeds, calculating rebate payments, and remitting any rebatable earnings to the federal government in a timely manner in order to preserve the tax-exempt status of the outstanding debt.

Covenant Compliance

The City will comply with all covenants stated in the bond ordinance, contract, etc.

Ongoing Disclosure

The Debt Manager shall be responsible for providing annual disclosure information to the Municipal Standards Rulemaking Board (MSRB) as required by state and national regulatory bodies. To comply with the Securities & Exchange Commission Rule 15c2-12 regulations, ongoing disclosure shall occur by the date designated in the bond ordinance, which is currently September 30 of each year. Disclosure shall take the form of the Comprehensive Annual Financial Report (CAFR) unless information is required by a particular bond issue that is not reasonably contained within the CAFR.