



Town of Thurston Deposits and Investment Policy

1. Purpose

This investment policy applies to all monies and other financial resources available for deposits and investment for the Town of Thurston.

The town board relied upon information contained in the General Municipal Law and in the “Local Government Management Guide”, dated as of August 2014 and published by the Office of the New York State Comptroller in drafting this policy.

2. Objectives

The primary objectives of Town of Thurston’s investment activities are, in priority order:

- a) conform with all applicable federal, state, and other legal requirements.
- b) adequately safeguard principal.
- c) provide sufficient liquidity to meet all library operating requirements; and,
- d) obtain a reasonable rate of return.

3. Delegation of Authority

The town board’s responsibility for administration of the investment program is delegated to the Michael J. Volino, Town Supervisor, who shall establish written procedures for the operation of the investment program consistent with this investment policy. Such procedures shall be approved by the town board and shall include an adequate internal control structure to provide a satisfactory level of accountability. In addition, the internal control procedures shall describe the responsibilities and levels of authority for key individuals involved in the investment program.

4. Prudence

All participants in the investment process shall seek to act responsibly as custodians of the public trust and shall avoid any transaction that might impair public confidence in the Town of Thurston to operate effectively.

Investments shall be made with prudence, diligence, judgment, and care, under circumstances then prevailing, which knowledgeable and prudent persons acting in like capacity would use, not for speculation, but for investment, considering the safety of the principal as well as the probable income to be derived.

All participants involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program or impair their ability to make impartial investment decisions.

5. Diversification

It is the policy of the Town of Thurston to consider diversifying its deposits and investments by financial institutions, by investment instrument, and by maturity scheduling.

6. Internal Controls

All monies collected by any public official or employee of the Town of Thurston shall be deposited within ten days of receipt, or within the time limit specified in law, whichever is shorter; a record of such deposit shall be conveyed by the Michael J. Volino, Town Supervisor.

The Michael J. Volino, Town Supervisor, in coordination with the Town Board, is responsible for establishing and maintaining an internal control structure to provide reasonable, but not absolute, assurance that deposits and investments are safeguarded against loss from unauthorized use or disposition, that transactions are executed in accordance with management's authorization, properly recorded, and managed in compliance with applicable laws and regulations.

7. Designation of Depositories

The banks and trust companies authorized for the deposit of monies, and the maximum amount which may be kept on deposit at any time are:

Depository name	Maximum Amount
Five Star Bank	\$500,000

8. Collateralizing of Deposits

All deposits and investments of the Town of Thurston, including all demand deposits, certificates of deposit and special time deposits, that are more than the amount insured under the provisions of the Federal Deposit Insurance Act, shall be secured by:

- a) A pledge of "eligible securities" with an aggregate "market value" as provided by General Municipal Law (GML) Section 10, that is at least equal to the aggregate number of deposits from the categories designated in subsection F of GML Section 10.
- b) A pledge of a pro rata portion of eligible securities, having in the aggregate a market value at least equal to the aggregate number of deposits.
- c) An irrevocable letter of credit issued in favor of the Town of Thurston by a federal home loan bank whose commercial paper and other unsecured short-term obligations are rated in the highest rating category by at least one nationally recognized rating organization, as security for the payment of 100 percent of the aggregate amount of deposits and the agreed-upon interest, if any.

9. Collateralization and Safekeeping

Eligible securities used for collateralizing deposits shall be held by the depository and/or third-party bank or trust company subject to security and custodial agreements in accordance with the provisions of General Municipal Law Section 10.

10. Permitted Investments

As provided by General Municipal Law Section 11, the Town of Thurston authorizes Michael J. Volino, Town Supervisor to invest monies not required for immediate expenditure for terms not to exceed its projected cash flow needs in the following types of investments:

- a) Special time deposit accounts
- b) Certificates of deposit
- c) Obligations of the United States of America (limited to T Notes and T Bills)

11. Authorized Financial Institutions

All financial institutions with which the Town of Thurston transacts business shall be creditworthy. The town board is responsible for evaluating the financial position and maintaining a list of proposed depositories, trading partners and custodians. Such listing shall be evaluated annually by Michael J. Volino, Town Supervisor and approved by the town board.

The Town of Thurston shall maintain a list of financial institutions approved for investments and establish appropriate limits on the number of investments that can be made with each financial institution or dealer.

12. Annual Review and Amendments

The town board shall review this investment policy annually at its Organizational Meeting and shall have the power to amend this policy at any time.

13. Resolution

Adopted on 1/3/2024 by a _____ vote of the governing board of the Town of Thurston.

Roll Call:

Michael Volino _____

Holly Chase _____

Noel Sylvester _____

Dan Gee _____

Jen Hargrave _____