

# **ATTACHMENT B**

**COMPARISON OF INVESTMENT RESTRICTIONS UNDER THE CALIFORNIA  
GOVERNMENT CODE AND THE CITY'S INVESTMENT POLICY**

**Comparison of Investment Restrictions Under the California Government Code and the City's Investment Policy - 2025**

City of Newport Beach Investment Policy				
Investment Type	Maximum Maturity	Maximum % of Portfolio	% Issuer	Minimum Rating Category
US Treasury	5 years	100%	100%	None
Federal Agency	5 years	100%	30%	None
Agency MBS/CMO	5 years	100%		None
Municipal Bonds	5 years	30%	5%	None
Negotiable CD	2 years	30%	5%	A-1 or A by an NRSRO
Non-Negotiable CD	2 years			FDIC insured/collateralized
Placement Service Deposits	Not Authorized			
Repurchase Agreement	30 days	30%	5%	A-1 and A by an NRSRO
Reverse Repurchase Agreement	30 days	10%	5%	A-1 and A by an NRSRO
Banker's Acceptances	180 days	40%	5%	A-1 and A by an NRSRO
Commercial Paper	270 days	40%	5%	A-1, A by an NRSRO, if long-term ratings
Corporate Medium Term Notes	5 years	30%	5%	A by an NRSRO
Non-Agency ABS/MBS/CMO	5 years	20%	5%	AAA by an NRSRO
Mutual Funds	N/A	20%	10%	Multiple***
Money Market Mutual Funds	N/A		20%	Multiple****
Local Agency Investment Fund	N/A	Maximum permitted by LAIF	None	None
California Asset Management Program	N/A	Maximum permitted by LAIF	None	Multiple**
Orange County Investment Pool	Not Authorized			
Supranationals	5 years	20%	10%	AA category by an NRSRO

California Government Code			
Maximum Maturity	Maximum % of Portfolio	% Issuer	Minimum Rating Category
5 years	None	None	None
5 years	None	None	None
5 years	None	None	None
5 years	None	None	None
5 years	30%	None	None
5 years	None	None	None
5 years	50%	None	None
1 year	None	None	None
1 year	20%	None	None
180 days	40%	30%	None
270 days	40%*	10%	A-1, A by an NRSRO, if long-term ratings
5 years	30%		A by an NRSRO
5 years	20%	5%	AA by an NRSRO
N/A	20%	10%	Multiple***
N/A		20%	Multiple****
N/A	Maximum permitted by LAIF	None	None
N/A	None	None	Multiple**
N/A	Maximum permitted by County Treasurer	None	None
5 years	30%	30%	AA category by an NRSRO

\*40% maximum for public agencies with assets under management >\$100 million, otherwise 25%.

\*\*Investment advisor for the JPA must be registered or exempt from SEC registration, AUM >\$500 million, and at least 5 years investing in instruments authorized by Section 53601 (a) to (f).

\*\*\*Highest ranking by at least 2 NRSROs, investment advisor for the fund must be registered or exempt from SEC registration, AUM >\$500 million, and at least 5 years investing in instruments authorized by Section 53601 and 53635.

\*\*\*\*Highest ranking by at least 2 NRSROs, investment advisor for the fund must be registered or exempt from SEC registration, AUM >\$500 million, and at least 5 years investing in money market instruments.