

COUNTY OF SACRAMENTO

DEPARTMENT OF FINANCE - AUDITOR-CONTROLLER DIVISION – INTERNAL AUDITS UNIT

**INTERNAL AUDIT UNIT REPORT
TREASURY OVERSIGHT COMMITTEE
NON-POOLED INVESTMENTS
PERFORMANCE AUDIT REPORT
FOR THE QUARTER ENDED
MARCH 31, 2025**



Audit Committee Submittal Date: 07/17/2025

SUMMARY

Background

As per Government Code Section 27131, the Sacramento County Treasury Oversight Committee (Committee) was established to oversee County of Sacramento (County) investments. As such, the Committee requests the Department of Finance to perform an audit on a quarterly basis to verify County non-pooled investments' compliance with governing bond documents, and applicable laws and regulations.

Audit Objective

The audit was conducted to verify the County Non-Pooled Investment Fund's compliance and the internal control over compliance with governing bond documents, and applicable laws and regulations for the quarter ended March 31, 2025.

Summary

Based on the audit, the County's Non-Pooled Investment Fund complied with governing bond documents, and applicable laws and regulations for the quarter ended March 31, 2025. The internal control over compliance with governing bond documents, and applicable laws and regulations appears adequate.

COUNTY OF SACRAMENTO

Treasury Oversight Committee
Non-Pooled Investments
Performance Audit Report

For the Quarter Ended March 31, 2025

Audit Staff:

Tae-Young Kang, CPA
Thomas Chung

Audit Manager
Auditor

**COUNTY OF SACRAMENTO
TREASURY OVERSIGHT COMMITTEE
NON-POOLED INVESTMENTS
PERFORMANCE AUDIT REPORT
FOR THE QUARTER ENDED MARCH 31, 2025**

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Department of Finance

Chad Rinde
Director

**Divisions**

Auditor-Controller
Consolidated Utilities Billing &
Service
Investments
Revenue Recovery
Tax Collection & Licensing
Treasury

County of Sacramento

May 6, 2025

The Honorable Board of Supervisors and
The Sacramento County Treasury Oversight Committee
County of Sacramento, California

We have audited the County of Sacramento (County) Non-Pooled Investment Funds (Fund) for the quarter ended March 31, 2025.

Our audit was conducted to verify the Fund's compliance as described below for the quarter ended March 31, 2025, and to verify whether the Department of Finance, Treasury Division (Treasury) and Investment Division (Investment) have adequate internal controls to ensure the Fund's compliance with their bond resolutions, bond indentures, or by the bond insurers (governing bond documents), and applicable laws and regulations.

Non-Pooled Investments primarily consist of investments purchased with proceeds from Mello Roos Bonds (MR), Revenue Bonds (REV), General Obligation Bonds (GO), Assessment District Bonds (AD), Community Facilities District Bonds (CFD), and Certificates of Participation Notes (COPs).

Most of the bond investments are limited to those authorized by California Government Code Section 53601 et seq. Any other authorized investments are indicated in the governing bond documents.

Management is responsible for the design, implementation, and maintenance of effective internal controls to ensure compliance with the bond documents.

The scope of our audit includes all non-pooled investments for the quarter ending March 31, 2025.

The audit methodology utilized to conduct the performance audit included:

Interview:

- We interviewed various Treasury and Investment staff to gain an understanding of policies, procedures, and processes for verifying the Fund's compliance with governing bond documents, and applicable laws and regulations.

The Honorable Board of Supervisors and
The Sacramento County Treasury Oversight Committee
May 6, 2025

Document Review:

- We reviewed the organizational chart and written documentation to understand the relevant policies, procedures, and processes and to identify any internal control weaknesses, conflicts of interest, or inadequate segregation of duties.

Process Walkthrough:

- We had Treasury and Investment staff walk us through step-by-step processes related to the daily activities of the Fund. We verified whether staff had followed the policies and procedures.

Testing:

- We verified the SymPro non-pooled investment balances agreed with the custodian statements and County's Financial System (COMPASS).
- We selected 10 out of a total of 39 non-pooled bond proceed funds, which represent approximately 25% of the total non-pooled investments based on outstanding issuances as of March 31, 2025, to test for compliance with their governing bond documents. There was one new bond issued during the period under audit. See ATT 1 – *Schedule of Sample Non-Pooled Investments*.
- We inspected the portfolio monitoring reports for the 10 selected bonds' investments and tested them for accuracy.
- We verified investments were made in accordance with the respective governing bond documents.
- We reviewed the non-pooled investment purchase report for the quarter ended March 31, 2025, selected 5 transactions from the report, and reviewed the transaction tickets (tickets) and other supporting documentation to verify that:
 - Either three competing bids were obtained from qualified institutions to select the investment trade with the lowest net cost and/or greatest net economic value, based on ratings criteria, limits and maturity date or if market circumstances precluded obtaining three competing bids, such circumstances were noted on the tickets.
 - The trade tickets were reviewed by the Director of Finance.

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards* (GAGAS) issued by the Comptroller General of the United States of America except for paragraph 3.56 regarding our independence as

The Honorable Board of Supervisors and
The Sacramento County Treasury Oversight Committee
May 6, 2025

described in the below paragraph. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

As required by various statutes within the California Government Code, County Auditor-Controllers or Directors of Finance are mandated to perform certain accounting, auditing, and financial reporting functions. These activities, in themselves, necessarily impair GAGAS' independence standards. Specifically, auditors should not audit their own work or provide non-audit services in situations where the amounts or services involved are significant/material to the subject matter of the audit.

Although the Director of Finance is statutorily obligated to maintain the non-pooled investment in the County Treasury, we believe the following safeguard and division of responsibility exist. The staff that has the responsibility to perform audits within the Auditor-Controller Division has no other responsibility regarding the internal control or compliance of the Fund, the accounts or records being audited including the approval or posting of financial transactions that would therefore enable the reader of this report to rely on the information contained herein.

Based on our audit, the Fund complied with governing bond documents, and applicable laws and regulations for the quarter ended March 31, 2025. Also, it appears that Treasury and Investment have adequate internal controls to ensure the Fund's compliance with governing bond documents, and applicable laws and regulations.

This report is intended solely for the information and use of the Sacramento County Board of Supervisors, Sacramento County Treasury Oversight Committee, Sacramento County Audit Committee, and Sacramento County Executive, and the management of Treasury and Investment, and should not be used for any other purpose. It is not intended to be, and should not be, used by anyone other than these specified parties. However, this report is a matter of public record, and its distribution is not limited.

Sincerely,

CHAD RINDE
DIRECTOR OF FINANCE

A handwritten signature in black ink, appearing to read 'T. Kang', with a stylized flourish at the end.

By: Tae-Young Kang, CPA
Audit Manager

ATT 1 – Schedule of Sample Non-Pooled Investments

COUNTY OF SACRAMENTO
TREASURY OVERSIGHT COMMITTEE
NON-POOLED INVESTMENTS
SCHEDULE OF SAMPLE NON-POOLED INVESTMENTS
FOR THE QUARTER ENDED MARCH 31, 2025

Issue ⁽¹⁾	Book Value 3/31/2025	% of Portfolio
Twin Rivers USD, Series 2022A (GO)	\$ 10,186,394.72	1
FCUSD SFID #5 2018 (GO)	11,483,219.64	1
Twin Rivers USD SFID, 2022A (GO)	17,178,855.47	2
Airports System Ref 2018A-C (REV)	18,283,039.36	2
Elk Grove USD, CFD 1, Ser 2023 (MR)	22,609,217.38	2
FCUSD SFID #3, Series D (GO)	25,110,332.09	2
Airport System 2009 A&B (REV)	38,813,078.83	4
SCWA, Series 2025 (REV)	52,999,737.44	5
Los Rios CCD Elec 08, Ser E (GO)	54,396,854.71	5
Sac City USD, Series 2024 B (GO)	225,724,115.13	21
 Total Non-pooled Investments tested	 \$ 476,784,844.77	 44 ⁽²⁾
Total Non-Pooled Investments	\$ 1,079,396,340.90	100

⁽¹⁾ The sample of non-pooled investments was selected based upon outstanding issues on March 31, 2025 including any untested new issues since quarter ended December 31, 2024

⁽²⁾ The sum of percentages may differ due to rounding.

Fund Type

(GO) - General Obligation Bonds

(MR) - Mello Roos Bonds

(REV) - Revenue Bonds

Indicates new issues