

April 20<sup>th</sup>, 2023

Ms. Kristina Alfaro  
Director of Administrative Services  
City of Cupertino

Dear Kristina,

The Chandler Team has completed our review of City of Cupertino's investment policy. Our review of the policy focused on compliance with the statutes of California Government Code (Code) that govern the investment of public funds, as well as on inclusion of current best practices. There was a change to Code Section 53601 for 2023 that we recommend the City adopt. Pursuant to Senate Bill 1489, effective January 1, 2023, the Code specified that an investment's term or remaining maturity shall be measured from settlement date to final maturity rather than from trade date. We have added the change in the *Maximum Maturities* and *Mitigating Market Risk in the Portfolio* sections. The City's policy continues to be effective as written.

Please do not hesitate to contact us with any questions you may have, or if further review is needed.

Sincerely,

Carlos Oblites  
Senior Portfolio Strategist  
Chandler Asset Management