



## ELLIS COUNTY INVESTMENT POLICY

Approved by Commissioners Court October 28, 2025

### Investment Officer

*Cheryl Chambers*

Ellis County Treasurer

101 W. Main Street, Suite 203

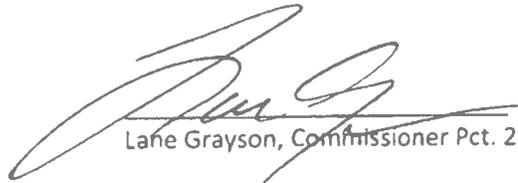
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Lane Grayson, Commissioner Pct. 2

  
Louis Ponder, Commissioner Pct. 3

  
Kyle Butler, Commissioner Pct. 4

# Ellis County Investment Policy

October 28, 2025

## I. Investment authority and scope of policy

### A: General Statement

This policy serves to satisfy the statutory requirements of Government Code Chapter 2256 to define and adopt a formal investment policy. Resolution to Adopt Investment Policy. This policy will be reviewed and adopted by resolution at least annually according to Section 2256.005 (E)

### B. Funds Included

This investment policy applies to all financial assets of all funds of Ellis County, Texas at the present time and any funds to be created in the future and any other funds held in custody by the Ellis County Treasurer.

### C: County's Investment Officer

In accordance with Government Code Chapter 2256.005 (f) and (g), Cheryl Chambers, Ellis County Treasurer, may invest County funds that are not immediately required to pay obligations of the County.

## II. Investment objectives

### A. General Statement

Funds of the County will be invested in accordance with federal and state laws, this investment policy and applicable written administrative procedures. The County will invest according to investment strategies for each fund as they are hereby adopted as Exhibit B.

### B. Safety and Maintenance of Adequate Liquidity

Ellis County is concerned about the return of its principal; therefore, safety of principal is the primary objective in any investment transaction. The County's investment portfolio must be structured in conformance with an asset/liability plan which provides for liquidity necessary to pay obligations as they become due. The Investment Officer shall monitor, on no less than a weekly basis, the credit rating on all authorized investments in the portfolio based upon required independent information from a nationally recognized rating agency. If any security falls below the minimum rating required by Policy, the

Investment Officer shall notify the Commissioner's Court of the loss of rating, conditions affecting the rating and possible loss of principal with liquidation options available, within two weeks after the loss of the required rating. This language will not limit the ability of the Investment Officer to liquidate the security at an earlier time if he or she feels it a prudent decision to do so.

#### C. Diversification

It will be the policy of Ellis County to diversify its portfolio to minimize the risk of loss resulting from over concentration of assets in a specific maturity, a specific issuer, or a specific class of investments.

#### D. Yield

It will be the objective of the County to earn the maximum rate of return allowed on its investments within the policies imposed by its safety and liquidity objectives, investment strategies for each fund, and state and federal laws governing investment of public funds.

#### E. Maturity

The maximum allowable stated maturity of any individual investment owned by the County is five years. The maximum weighted average maturity of the portfolio is not to exceed three years.

#### F. Quality and Capability of Investment Management

It is the County's policy to provide training required by Government Code 2256, and periodic training in investments for the County Investment Officer through courses and seminars offered by professional organizations and associations in order to insure the quality and capability of the County Investment Officer in making investment decisions.

### III. Investment Types

The Ellis County Investment Officer shall use any or all of the following authorized investment instruments consistent with governing law.

**AUTHORIZED INVESTMENTS: OBLIGATIONS OF, OR GUARANTEED BY GOVERNMENTAL ENTITIES.** (a) Except as provided by Subsection (b), the following are authorized investments under this subchapter:

- (1) obligations, of the United States or its agencies and instrumentalities, excluding mortgage-backed securities.
- (2) direct obligations of this state or its agencies and instrumentalities;

(3) collateralized mortgage obligations directly issued by a federal agency or instrumentality of the United States, the underlying security for which is guaranteed by an agency or instrumentality of the United States;

(4) other obligations, the principal and interest of which are unconditionally guaranteed or insured by, or backed by the full faith and credit of, this state or the United States or their respective agencies and instrumentalities;

(5) obligations of states, agencies, counties, cities, and other political subdivisions of any state rated as to investment quality by a nationally recognized investment rating firm not less than A or its equivalent; and

(b) The following are not authorized investments under this section:

(1) obligations whose payment represents the coupon payments on the outstanding principal balance of the underlying mortgage-backed security collateral and pays no principal;

(2) obligations whose payment represents the principal stream of cash flow from the underlying mortgage-backed security collateral and bears no interest;

(3) collateralized mortgage obligations that have a stated final maturity date of greater than 10 years; and

(4) collateralized mortgage obligations the interest rate of which is determined by an index that adjusts opposite to the changes in a market index.

**AUTHORIZED INVESTMENTS: CERTIFICATES OF DEPOSIT AND SHARE CERTIFICATES.** (a) A certificate of deposit or share certificate is an authorized investment under this subchapter if the certificate is issued by a depository institution that has its main office or a branch office in this state and is:

(1) guaranteed or insured by the Federal Deposit Insurance Corporation or its successor or the National Credit Union Share Insurance Fund or its successor;

(2) secured by obligations that are described by Section 2256.009(a), including mortgage backed securities directly issued by a federal agency or instrumentality that have a market value of not less than the principal amount of the certificates, but excluding those mortgage backed securities of the nature described by Section 2256.009(b); or

(3) secured in any other manner and amount provided by law for deposits of the investing entity.

(b) In addition to the authority to invest funds in certificates of deposit under Subsection (a), an investment in certificates of deposit made in accordance with the following conditions is an authorized investment under this subchapter:

Fully insured or collateralized certificates of deposit from any bank doing business in the State of Texas and under the terms of a written agreement with that bank,

not to exceed two years to stated maturity, to include certificates of deposit purchased through the CDARS program with a Texas bank; FDIC/NCUA insured brokered certificates of deposit securities from a bank in any US state, delivered versus payment to Ellis County's safekeeping agent, not to exceed two years to maturity. Before purchase, the Investment Officer must verify the FDIC status of the bank on [www.2fdic.gov/idasp/main\\_bankfind.asp](http://www.2fdic.gov/idasp/main_bankfind.asp) to assure that the bank is FDIC insured. The Investment Officer shall monitor, on no less than a weekly basis, the status and ownership of all banks issuing brokered CDs owned by Ellis County based upon information from the FDIC. If any bank has been acquired or merged with another bank in which brokered CDs are owned, the Investment Officer shall immediately liquidate any brokered CD which places Ellis County above the FDIC insurance level.

**AUTHORIZED INVESTMENTS: MONEY MARKET MUTUAL FUNDS.**

Money Market Mutual Funds registered with and regulated by the Securities and Exchange Commission and fully conforming to Government Code 2256.014, Subsection (a).

**AUTHORIZED INVESTMENTS: COMMERCIAL PAPER.** Commercial paper with a stated maturity not to exceed 365 days, as permitted by Government Code 2256.013. Commercial paper shall not exceed 40% of the County's total investment portfolio at the time of purchase. Commercial paper shall be limited to no more than 5% of the total portfolio in any one issuer.

**AUTHORIZED INVESTMENTS: INVESTMENT POOLS.** (a) An entity may invest its funds and funds under its control through an eligible investment pool if the governing body of the entity by rule, order, ordinance, or resolution, as appropriate, authorizes investment in the particular pool. An investment pool shall invest the funds it receives from entities in authorized investments permitted by this subchapter.

(b) To be eligible to receive funds from and invest funds on behalf of an entity under this chapter, an investment pool must furnish to the investment officer or other authorized representative of the entity an offering circular or other similar disclosure instrument that contains, at a minimum, the following information:

- (1) the types of investments in which money is allowed to be invested;
- (2) the maximum average dollar-weighted maturity allowed, based on the stated maturity date, of the pool;
- (3) the maximum stated maturity date any investment security within the portfolio has;
- (4) the objectives of the pool;
- (5) the size of the pool;
- (6) the names of the members of the advisory board of the pool and

the dates their terms expire;

(7) the custodian bank that will safekeep the pool's assets;

(8) whether the intent of the pool is to maintain a net asset value of one dollar and the risk of market price fluctuation;

(9) whether the only source of payment is the assets of the pool at market value or whether there is a secondary source of payment, such as insurance or guarantees, and a description of the secondary source of payment;

(10) the name and address of the independent auditor of the pool;

(11) the requirements to be satisfied for an entity to deposit funds in and withdraw funds from the pool and any deadlines or other operating policies required for the entity to invest funds in and withdraw funds from the pool; and

(12) the performance history of the pool, including yield, average dollar-weighted maturities, and expense ratios.

(c) To maintain eligibility to receive funds from and invest funds on behalf of an entity under this chapter, an investment pool must furnish to the investment officer or other authorized representative of the entity:

(1) investment transaction confirmations; and

(2) a monthly report that contains, at a minimum, the following information:

(A) the types and percentage breakdown of securities in which the pool is invested;

(B) the current average dollar-weighted maturity, based on the stated maturity date, of the pool;

(C) the current percentage of the pool's portfolio in investments that have stated maturities of more than one year;

(D) the book value versus the market value of the pool's portfolio, using amortized cost valuation;

(E) the size of the pool;

(F) the number of participants in the pool;

(G) the custodian bank that is safekeeping the assets of the pool;

(H) a listing of daily transaction activity of the entity participating in the pool;

(I) the yield and expense ratio of the pool;

(J) the portfolio managers of the pool; and

(K) any changes or addenda to the offering circular.

(d) An entity by contract may delegate to an investment pool the authority to hold legal title as custodian of investments purchased with its local funds.

(e) In this section, "yield" shall be calculated in accordance with regulations governing the registration of open-end management investment companies under the Investment Company Act of 1940, as promulgated from time to time by the federal Securities and Exchange Commission.

(f) To be eligible to receive funds from and invest funds on behalf of an entity under this chapter, a public funds investment pool created to function as a money market mutual fund must mark its portfolio to market daily, and, to the extent reasonably possible, stabilize at a \$1 net asset value. If the ratio of the market value of the portfolio divided by the book value of the portfolio is less than 0.995 or greater than 1.005, portfolio holdings shall be sold as necessary to maintain the ratio between 0.995 and 1.005.

(g) To be eligible to receive funds from and invest funds on behalf of an entity under this chapter, a public funds investment pool must have an advisory board composed:

(1) equally of participants in the pool and other persons who do not have a business relationship with the pool and are qualified to advise the pool, for a public funds investment pool created under Chapter 791 and managed by a state agency; or

(2) of participants in the pool and other persons who do not have a business relationship with the pool and are qualified to advise the pool, for other investment pools.

(h) To maintain eligibility to receive funds from and invest funds on behalf of an entity under this chapter, an investment pool must be continuously rated no lower than AAA or AAA-m or at an equivalent rating by at least one nationally recognized rating service.

**RATING OF CERTAIN INVESTMENT POOLS.** A public funds investment pool must be continuously rated no lower than AAA or AAA-m or at an equivalent rating by at least one nationally recognized rating service or no lower than investment grade by at least one nationally recognized rating service with a weighted average maturity no greater than 90 days.

#### IV. Investment Responsibility and Control

##### A. Investment Institutions Defined

The Ellis County Investment Officer shall invest County funds with any or all of the following institutions or groups consistent with federal and state law and the current Depository and Sub-Depository Bank contracts.

1. Depository Bank
2. Sub-Depository Bank(s)
3. Other state or national banks domiciled in Texas that are insured by FDIC or its successor
4. State or federal credit unions domiciled in Texas that are insured by FDIC or National Credit Union Share Insurance Fund or its successor

#### B. Qualifications for Broker/Dealers

A written copy of this investment policy shall be presented to any person seeking to sell to the County an authorized investment. The qualified representative of the business organization offering to engage in an investment transaction with the County shall execute a written instrument in a form acceptable to the County and the business organization substantially to the effect that the business organization has:

1. Received and thoroughly reviewed the investment policy of the County; and
2. Acknowledged that the organization has implemented reasonable procedures and controls in an effort to preclude imprudent investment activities arising out of investment transactions conducted between the County and the organization. The County Investment Officer may not buy any securities from a person who has not delivered to the County an instrument in substantially the form provided above according to Government Code Section 2256.005 (I)

C. Investment Advisors: The County may contract from time to time with registered, private investment management firm for investing County funds in accordance with this Investment Policy. The Investment Officer(s) shall be responsible for monitoring the activities of such investment management firm to ensure it compliance with the Investment Policy and to prepare and provide reports to the Commissioners Court on the investments of the funds as required by the Public Funds Investment Act. The investment advisor may act as the investment officer for the County in accordance with this policy.

By adopting this investment policy, the Ellis County Commissioners Court is authorizing the use of the broker/dealers as listed in Exhibit C. If the County chooses to utilize a

registered investment advisor, the compliance files of authorized broker dealers will be maintained by the advisor.

#### D. Standards of Operation

The County Investment Officer shall develop and maintain administrative procedures for the operation of the investment program, consistent with this investment policy.

#### E. Methods to Monitor Market Price

At least two outside sources of pricing information shall be contacted prior to the purchase of securities using public funds. These sources may include but are not limited to the following: competing broker/dealers, printed financial sections of periodicals, internet web sites, and Bloomberg Reports.

#### F. Delivery vs. Payment

It will be the policy of the County to settle all transactions, except investment pool funds and mutual funds, on a Delivery vs. Payment (DVP) method through the Federal Reserve System. By so doing, County funds are not released until the County has received through the Federal Reserve Wire, the securities purchased.

#### G. Audit Control

The Ellis County Commissioner's Court will have an annual financial audit of all County funds by an independent auditing firm as well as an annual compliance audit of management controls on investments and adherence to the County's established investment policies in accordance with Government Code 2256.005 (M).

#### H. Standard of Care

Investments shall be made with judgement and care, under prevailing circumstances, that a person of prudence, discretion, and intelligence would exercise in the management of the person's own affairs, not for speculation, but for investment, considering the probable safety of capital and the probable income to be derived. Investment of funds shall be governed by the following investment objectives, in order of priority: preservation and safety of principal, liquidity and yield. In determining whether the Investment Officer has exercised prudence with respect to an investment decision, the determination shall be made taking into consideration:

1. The investment of all funds, or funds under the County's control, over which the Officer had responsibility, rather than a consideration as to the prudence of a single investment; and
2. Whether the investment decision was consistent with the written investment policy of the County.

V. Investment Reporting

A. Quarterly Report

Not less than quarterly, the Investment Officer shall prepare and submit to the Commissioner's Court a written report of investment transactions for all funds for the preceding reporting period within a reasonable time after the end of the period. This report will be in compliance with Government Code 2256.023

VI. Investment Collateral and Safekeeping

The Ellis County Treasurer shall insure that all non-invested county funds are fully collateralized or insured by:

Obligations of the U.S. or its agencies and instrumentalities

2. Collateralized mortgage obligations directly issued by a federal agency or instrumentality or the U.S., the underlying security for which is guaranteed by an agency or instrumentality of the U.S, and are not:
  - (a) obligations whose payment represents the coupon payments on the outstanding principal balance of the underlying mortgage-backed security collateral and pays no principal (IO's); or
  - (b) obligations whose payment represents the principal stream of cash flow from the underlying mortgage-backed security collateral and bears no interest (PO's); or
  - (c) collateralized mortgage obligations that have a stated final maturity date of greater than 10 years; or
  - (d) collateralized mortgage obligations, the interest rate of which is determined by an index that adjusts opposite to the changes in the market index (inverse floaters).
3. Other obligations the principal and interest of which are unconditionally guaranteed or insured by or backed by the full faith and credit of the State of Texas or the U.S. or their respective agencies and instrumentalities.

All purchased securities shall be held in third-party custodial safekeeping by the County. All certificates of deposit, purchased outside the Depository Bank shall be held in safekeeping by either the County or a County account in a financial institution. All pledged

securities by the Depository Bank shall be held in safekeeping by the County, or a County account in a financial institution, or with the Federal Reserve Bank.

Exhibit B  
**INVESTMENT STRATEGY**

October 28, 2025

All available non-cash funds of Ellis County are invested by matching the maturity of investments with liabilities. Investments are made with the intention of holding to maturity, but with the ability to liquidate should funds be needed at any time. It will be the objective of the County to earn the maximum rate of return allowed on its investments within the policies imposed by its safety and liquidity objectives. This strategy is achieved by investing in instruments authorized by the County's investment policy.

Ellis County Pooled Cash Funds:

- General
- Road Improvement Fund
- Road and Bridge
- Farm to Market
- Lateral Road
- County & District Court Tech
- Justice Court Technology
- DC Archives Records Mgt.
- Permanent Improvement
- Law Library
- Records Management
- CC Archives Records Management
- Right of Way Available
- District Clerk Records Tech
- Road District #1
- Road District #5
- Road District #16
- District Attorney Check Processing
- District Attorney Drug Forfeiture
- General Records Manage/Preserv.
- Courthouse Security
- Court Rec. Preservation 51.708
- Election Admin. Fees
- Fire Marshal
- County Clerk Vitals Preservation
- Truancy & Prevention

Other Funds of Ellis County:

- Debt Service
- Adult Probation
- Juvenile Probation
- Jury
- Sheriff Federal Drug Forfeiture
- Sheriff Seizure
- Sheriff Drug Forfeiture
- District Attorney Drug Seizure
- Levee Improvement District #2
- Levee Improvement District #3
- American Rescue Plan

## Exhibit C

### Authorized Brokers

Adopted October 28, 2025

Chapter 2256 of the Texas Statutes provides for the investment of public funds. Section 2256.025 provides that the governing body of an investing entity or the designated investment committee of the entity shall, at least annually, review, revise, and adopt a list of qualified brokers that are authorized to engage in investment transactions with the entity.

In compliance with Section 2256.025 of the Texas Statutes, the County Commissioners of Ellis County have adopted the following list of qualified brokers that are authorized to engage in investment transactions with Ellis County.

Adopted by the County Commissioners of Ellis County this 28th day of October 2025.

Academy Securities	Keybank Capital Markets
Ameriprise Financial Services	Loop Capital Markets
Alamo Capital	Market Axess Corporation
Arbor Research & Trading, LLC	Mizuho Securities
Bank of America/Merrill Lynch	Moreton Capital Markets
Barclays Capital Inc.	Morgan Stanley
Basis Investment Services	Multi-Bank Securities
Blaylock Van, LLC	Oppenheimer
BMO Capital Markets	Piper Sandler & Co.
BNY Capital Markets	PNC Capital Markets LLC
BOK Financial	Raymond James
Brean Capital	RBC Securities
Cantor Fitzgerald & Co.	Rice Financial
CastleOak Securities	Robert W. Baird
Citigroup Global Markets, Inc.	Santander US Capital Markets
D.A. Davidson	Siebert Willams Shank
Daiwa Capital Markets	Stephens, Inc.
FHN Financial	Stifel Nicolaus
First Financial Bank	StoneX Group, Inc.
Goldman Sachs & Co.	TD Securities
Great Pacific	Truist Securities, Inc.
Hilltop Securities	UBS Financial
Hunting Bank	UMB Financial Services
Inspere X (formerly inCapital)	U.S. Bancorp Investments
Jane Street	Wells Fargo
Jefferies	
JP Morgan Securities	

Investment Pools

LoneStar Investments

TexPool/TexPool Prime

TexStar

Texas Class

Texas Range

LOGIC

## Approved Broker/Dealer List 9/30/2025



Broker/Dealer	Broker/Dealer
Academy Securities <sup>2</sup>	Loop Capital Markets <sup>2</sup>
Alamo Capital <sup>2</sup>	MarketAxess Corporation
Arbor Research & Trading, LLC	Mizuho Securities <sup>1</sup>
Bank of America/Merrill Lynch <sup>1</sup>	Moreton Capital Markets
Barclays Capital Inc. <sup>1</sup>	Morgan Stanley <sup>1</sup>
Blaylock Van, LLC <sup>2</sup>	Multi-Bank Securities <sup>2</sup>
BMO Capital Markets <sup>1</sup>	Oppenheimer
BNY Capital Markets	Piper Sandler & Co
BOK Financial	PNC Capital Markets LLC
Brean Capital	Raymond James
Cantor Fitzgerald & Co. <sup>1</sup>	RBC Securities <sup>1</sup>
CastleOak Securities <sup>2</sup>	Rice Financial
Citigroup Global Markets Inc <sup>1</sup>	Robert W. Baird
D.A. Davidson	Santander US Capital Markets <sup>1</sup>
Daiwa Capital Markets <sup>1</sup>	Siebert Williams Shank <sup>2</sup>
FHN Financial	Stephens Inc
Goldman Sachs & Co. <sup>1</sup>	Stifel Nicolaus
Great Pacific <sup>2</sup>	StoneX Group Inc.
Hilltop Securities	TD Securities <sup>1</sup>
Huntington Bank	Truist Securities Inc.
InspereX (formerly InCapital)	UBS Financial <sup>1</sup>
Jane Street	UMB Financial Services
Jefferies <sup>1</sup>	U.S. Bancorp Investments
JPMorgan Securities <sup>1</sup>	Wells Fargo <sup>1</sup>
Keybank Capital Markets	

Note: Direct issuers of CP and CDs are considered to be approved counterparties if approved as an issuer.

*1 Primary Government Securities Dealer*

*2 Minority, Woman owned, or Service Disabled-Veteran owned Enterprise*

### Important Disclosures

This list is current as of the effective date only and is subject to change without notice. This list is for informational purposes only, and may not be relied upon for any other purpose. The list does not imply counterparty approval for derivatives of any type. This information is confidential and may not be distributed without prior written consent of Meeder Public Funds, Inc.