SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



MEETING DATE: Tuesday, April 07, 2020

FROM: AUDITOR CONTROLLER:

SUBJECT: AUDITOR-CONTROLLER: Fiscal year 2018-19 Statement of Net Position of the

Treasurer's Investment Pool with Independent Auditor's Report, District: All. [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:

 Receive and file the Fiscal Year 2018-19 Statement of Net Position of the Treasurer's Investment Pool with Independent Auditor's Report

ACTION:Consent

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Spiegel, seconded by Supervisor Perez and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes:

Jeffries, Spiegel, Washington, Perez and Hewitt

Nays: Absent: None

None

Date:

April 7, 2020

XC:

Auditor

2.11

Kecia R. Harper

SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

BACKGROUND:

Summary

The county's fiscal year 2018-19 Statement of Net Position of the Treasurer's Investment Pool with Independent Auditor's Report is hereby submitted in accordance with Sections 26920(a) and 26922 of the Government Code of the State of California. The county's external auditors, Brown Armstrong Accountancy Corporation, performed the audit to determine whether cash and investments as shown on the Statement of Net Position of the Treasurer's Investment Pool as of June 30, 2019, were presented fairly.

FINANCIAL DATA	Current Fisca	l Year:	Next Fisca	l Year:	Total Cost:	Ongoing Cost		
COST	\$	0.0	\$	0.0	\$ 0.0	\$ 0.0		
NET COUNTY COST	\$	0.0	\$	0.0	\$ 0.0	\$ 0.0		
SOURCE OF FUNDS	3: N/A	Budget Adjus						

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary (continued)

Based on the results of their audit, the Statement of Net Position presents fairly, the financial position of the investment pool of the County of Riverside as of June 30, 2019. Internal controls over financial reporting and tests of compliance with certain provisions of laws, regulations, contracts, grant agreements, and other matters were also evaluated.

Impact on Residents and Businesses

Provide an assessment of internal controls over the audited areas.

ATTACHMENT A. Fiscal Year 2018-19 Statement of Net Position of the Treasurer's Investment Pool with Independent Auditor's Report

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COUNTY OF RIVERSIDE TREASURER'S INVESTMENT POOL

STATEMENT OF NET POSITION WITH INDEPENDENT AUDITOR'S REPORT

JUNE 30, 2019

COUNTY OF RIVERSIDE TREASURER'S INVESTMENT POOL JUNE 30, 2019

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BROWN ARMSTRONG

Certified Public Accountants

INDEPENDENT AUDITOR'S REPORT

To the Board of Supervisors County of Riverside, California

Report on Financial Statement

We have audited the accompanying Statement of Net Position of the Treasurer's Investment Pool of the County of Riverside (the County) as of June 30, 2019, and the related notes to the financial statement, which collectively comprise the County Treasurer's Investment Pool's basic financial statement as listed in the table of contents.

Management's Responsibility for the Financial Statement

Management is responsible for the preparation and fair presentation of this basic financial statement in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of a financial statement that is free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on this financial statement based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statement. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relating to the Treasurer's Investment Pool relevant to the County's preparation and fair presentation of the financial statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the County's internal control relating to the Treasurer's Investment Pool. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statement.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the basic financial statement referred to above presents fairly, in all material respects, the financial position of the Treasurer's Investment Pool of the County as of June 30, 2019, in accordance with accounting principles generally accepted in the United States of America.

Other Reporting Required by Government Auditing Standards

In accordance with Government Auditing Standards, we have also issued our report dated February 25, 2020, on our consideration of the County's internal control over financial reporting relating to the Treasurer's Investment Pool and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with Government Auditing Standards in considering the County's internal control over financial reporting and compliance relating to the Treasurer's Investment Pool.

BROWN ARMSTRONG
ACCOUNTANCY CORPORATION

Grain Amstrong fecountainey Corporation

Bakersfield, California February 25, 2020

COUNTY OF RIVERSIDE TREASURER'S INVESTMENT POOL STATEMENT OF NET POSITION JUNE 30, 2019 (Dollars in Thousands)

ASSETS: Cash and investments 6,700,200 Restricted cash and investments 607,129 Total assets 7,307,329 **LIABILITIES AND NET POSITION:** Liabilities: Due to others **Total liabilities** Net position: Held in trust for treasury pool participants 7,307,329 Total net position 7,307,329

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. Description of the Reporting Entity

As provided by Government Code Section 53600, the cash balances of substantially all of the County of Riverside's (the County) funds, as well as those of participating schools and agencies, are pooled and invested by the County Treasurer for the purpose of increasing earnings through investment activities. The Treasurer's Investment Pool (the Pool) is managed by the County Treasurer and is not registered with the Securities and Exchange Commission. The Pool's investment objectives are to safeguard principal, meet the liquidity needs of the participants, and return an acceptable yield within the parameters of prudent risk management (California Government Code Sections 2700.5 and 53600.5). Additionally, there is an Oversight Committee comprised of County officials, representatives from various Pool participants, and members of the public, whose function is to monitor compliance with the County's investment policy. The Treasurer also reports on a monthly basis to the County Board of Supervisors.

B. Reporting Method

The Pool follows the accounting principles and reporting guidelines as set forth by the Governmental Accounting Standards Board (GASB).

C. Investment Valuation

Pool investments are accounted for in accordance with the provisions of GASB Statement No. 31, Accounting and Financial Reporting for Certain Investments and for External Investment Pools, which requires governmental entities to report certain investments at fair value in the statement of net position and recognize the corresponding change in fair value of investments in the year in which the change occurred. The fair value of pooled investments is determined monthly and is based upon valuation provided by the Pool's safekeeping agent.

Pool investments are also accounted for in accordance with the provisions of GASB Statement No. 72, Fair Value Measurement and Application. Securities, including U.S. Treasury and Agency securities, are carried at fair value/cost based on current market prices, on a monthly basis. Repurchase agreements are carried at fair value based on quoted market prices, except for repurchase agreements maturing within ninety days of June 30, 2019, which are carried at cost. Bond anticipation notes are carried at fair value/cost. Commercial paper is carried at amortized cost/cost. Investments in bankers' acceptances and nonparticipating guaranteed investment contracts are carried at cost. Participating guaranteed investment contracts are carried at fair value based on net realizable value. Mutual funds are carried at fair value based on the funds' share price. Local Agency Obligations are carried at cost based on the value of each participating dollar.

The fair value of a participant's position in the pool is not the same as the value of pooled shares. The method used to determine the value of participants' equity withdrawn is based on the book value, amortized cost, and accrued interest of the participants' percentage at the date of such withdrawal.

NOTE 2 - CASH AND INVESTMENTS

Cash and Investments

As of June 30, 2019, cash and investments are classified in the County's financial statements as follows (in thousands):

	Governmental Activities	Business-Type Activities	Discretely Presented Component Units	Fiduciary Funds	Total	
Cash and investments Restricted cash and investments	\$ 1,251,677 500,797	\$ 146,402 106,332	\$ 32,288	\$ 5,269,833	\$ 6,700,200 607,129	
Total cash and investments	\$ 1,752,474	\$ 252,734	\$ 32,288	\$ 5,269,833	\$ 7,307,329	

As of June 30, 2019, cash and investments consist of the following (in thousands):

Deposits	\$ 245,566
Investments	7,061,763
Total Cash and Investments	\$ 7,307,329

Investments Authorized by the California Government Code and the County's Investment Policy

The table below identifies the investment types that are authorized for the County by the California Government Code or the County's investment policy, whichever is more restrictive. The table also identifies certain provisions that address interest rate, credit risk, and concentration of credit risk. A copy of the County's investment policy can be found at www.treasurer-tax.co.riverside.ca.us.

Maximum	Maximum Percentage	Maximum Investment
Maturity	of Portfolio	in One Issuer
4 Years	15%	5%**
5 Years	100%	N/A
3 Years	2.5%	2.5%
5 Years	100%	N/A
270 Days	40%	5% *
1 Year	25%	5% *
45 Days	40% / 25%	20%
60 Days	10%	10%
3 Years	20%	5% *
Daily Liquidity	1%	1%
Daily Liquidity	20%	None
Daily Liquidity	Max \$50 Million	N/A
N/A	N/A	N/A
	Maturity 4 Years 5 Years 3 Years 5 Years 270 Days 1 Year 45 Days 60 Days 3 Years Daily Liquidity Daily Liquidity	Maximum Maturity Percentage of Portfolio 4 Years 15% 5 Years 100% 3 Years 2.5% 5 Years 100% 270 Days 40% 1 Year 25% 45 Days 40% / 25% 60 Days 10% 3 Years 20% Daily Liquidity 1% Daily Liquidity 20% Daily Liquidity Max \$50 Million

^{*} Maximum of 5% per issuer in combined commercial paper, certificate and time deposits, and medium-term notes.

For credit rated below AA-/Aa3, a 2% maximum in one issuer only for State of California debt.

NOTE 2 - CASH AND INVESTMENTS (Continued)

Investments Authorized by the California Government Code and the County's Investment Policy (Continued)

The County and Component Units have the following recurring fair value measurements as of June 30, 2019 (in thousands):

	June 30, 2019	Interest Rate Range	Maturity	Weighted Average Maturity (Years)	Minimum Legal Rating	Rating ⁽¹⁾ June 30,	% of Portfolio
County Treasurer's Investments							
Investments by Fair Value Level							
U.S. treasuries	\$ 588,211	0.875-2.458%	07/19 - 06/24	0.31	N/A	AA+/Aaa	8.60%
Federal home loan mortgage corp.	1,366,102	1,200-3,160%	07/19 - 06/24	2.13	N/A	AA+/Aaa	19.98%
Federal national mortgage association	398,153	1,000-2,875%	07/19 - 09/23	1.41	N/A:	AA+/Aaa	5.82%
Federal home loan bank	1,105,191	1.500-2,717%	07/19 - 07/23	1,16	N/A	AA+/Aaa	16.16%
Federal farm credit bank	824,037	1.320-3.330%	08/19 - 06/24	1.73	N/A	AA+/Aaa	12.05%
Farmer mac	160,502	1.420-2,850%	07/19 - 06/23	0.12	N/A	N/R	2.35%
Municipal notes	234,957	1.151-4.000%	07/19 - 06/23	0:02	AA-/Aa3/AA-	AAA/Aaa	3.44%
Commercial paper	920,200	2.260.2,790%	07/19 - 01/20	0.16	A1/P1/F1	AAA/Aaa	13,46%
Corporate notes	292,356	1.100-2.000%	08/19 - 03/21	0.60	AA/Aa2/AA	AAA/Aaa	4,26%
Total County Treasurer's Investments		V +1					
by Fair Value Level	5,889,709						86.12%
Investments Measured at Amortized Cost							
Farmer mac	25,000	2.726%	5/29/2020	0.01	N/A	N/R	0.37%
Negotiable certificates of deposit	35,000	3.000%	8/16/2019	0,13	A1/P1/F1	AA-/Aa2	0.51%
Managed rate accounts	778,000	2.480%	7/1/2019	0.00	N/A	N/R	11.38%
Local agency obligations	80	2.845%	6/15/2020	0.96	N/A	N/R	0.00%
CalTRUST short term fund	4.024	2.547%	7/1/2019	0.00	N/A	AA+/Aaa	0.06%
Money market mutual funds (2)	107,000	2.272-2.283%	7/1/2019	0.00	AAA	AAA/Aaa	1.56%
Total Investments Measured at			V V V V V V V V V V V V V V V V V V V	0,00			
Amortized Cost	949,104						13.88%
Total County Treasurer's Investments	6,838,813						100.00%
Investments Measured at Amortized Cost							
Money market funds	120.134	0.000 - 2.32%		N/A	AAA/Aaa	AAA/Aaa	53:88%
Certificates of deposit	1,000	0.300%	10/18-10/19		12.22.00		0.45%
Local agency investment funds	4,502	2.390%	7/1/2019	N/A	N/A	N/R	2.02%
Mutual funds	94,532	0.000-5.740%				NR/Aaa	42.40%
Investment agreements	2,782	4.828%	2/12/2035				1.25%
Total Blended Component Unit Investments	THE PERSON NAMED IN COLUMN 2 I		2,10,200				-
Measured at Amortized Cost							100.00%
Total Blended Component Unit Investments	222,950						100.00%
Total Investments	\$ 7,061,763						

⁽¹⁾ Investment ratings are from Standard & Poor's (S&P) and Moody's Investor Service (Moody's).

⁽²⁾ Government Code requires money market mutual funds to be rated.

NOTE 2 - CASH AND INVESTMENTS (Continued)

Fair Value Measurements

The County and its component units categorize fair value measurements within the fair value hierarchy established by accounting principles generally accepted in the United States of America. The hierarchy is based on the valuation inputs used to measure the fair value of the asset. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (Level 1 measurements) and the lowest priority to unobservable inputs (Level 3 measurements). The three levels of the fair value hierarchy are described as follows:

- Level 1: Inputs to the valuation methodology are unadjusted quoted prices for identical assets or liabilities in active markets that the County has the ability to access.
- Level 2: Inputs to the valuation methodology include: quoted prices for similar assets or liabilities
 in active markets; quoted prices for identical or similar assets or liabilities in inactive markets;
 inputs other than quoted prices that are observable for the asset or liability; and inputs that are
 derived principally from or corroborated by observable market data by correlation or other means.
- Level 3: Inputs to the valuation methodology are unobservable and significant to the fair value measurement. Unobservable inputs reflect the County's own assumptions about the inputs market participants would use in pricing the asset or liability (including assumptions about risk).

NOTE 2 - CASH AND INVESTMENTS (Continued)

Fair Value Measurements (Continued)

The County has the following recurring fair value measurements as of June 30, 2019 (in thousands):

	Name and the	Fair Va				
Investments by Fair Value Level		oted Prices in Active arkets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)	June 30, 2019	
County Treasurer's Investments		*				
Investments by Fair Value Level				31		
U.S. treasuries	\$	588,211	\$ -	\$	\$ 588,211	
Federal home loan mortgage corp.		: **	1,366,102	· •	1,366,102	
Federal national mortgage association		*****	398,153	PA	398,153	
Federal home loan bank		•	1,105,191	-	1,105,191	
Federal farm credit bank		-√=	824,037	*	824,037	
Farmer mac		*	160,502	·	160,502	
Municipal notes		7.0	234,957	**	234,957	
Commercial paper		P\$-	920,200	· 👼	920,200	
Corporate notes	-		292,356		292,356	
Total County Treasurer's Investments by Fair Value Level		588,211	5,301,498	_	5,889,709	
gy rail value cevel	***********	300,211	3,301,430		<u> </u>	
Investments Measured at Amortized Cost						
Farmer mac		5 <u>4</u> 8	·	·	25,000	
Negotiable certificates of deposit			4	, -	35,000	
Managed rate accounts		:3:	<u>.</u>		778,000	
Local agency obligations		× ••	:#4	· ,	80	
CalTRUST short term fund		***			4.024	
Money market mutual funds					107,000	
Total Investments Measured at	**************************************			· · · · · · · · · · · · · · · · · · ·		
Amortized Cost					949,104	
Total County Treasurer's Investments		588,211	5,301,498		6,838,813	
Investments Measured at Amortized Cost						
Money market funds		1984	سؤ		120,134	
Certificates of deposit			- 27, 1984 *	-	1,000	
Local agency investment funds		· · · · · · · · · · · · · · · · · · ·	:4		4,502	
Mutual funds					94,532	
Investment agreements		- 2 -	Family	•	2,782	
Total Blended Component Unit Investments	***************************************	· · · · · · · · · · · · · · · · · · ·				
Measured at Amortized Cost		*		· ·	222,950	
Total Blended Component Unit Investments	1	-: -:			222,950	
Total Investments	\$	588,211	\$ 5,301,498	\$	\$ 7,061,763	
				* *		

NOTE 2 - CASH AND INVESTMENTS (Continued)

Investment in State Investment Pool

The County is a voluntary participant in the Local Agency Investment Fund (LAIF) that is regulated by California Government Code Section 16429 under the oversight of the Treasurer of the State of California (the State). The State Treasurer's Office reports its investments at fair value. The fair value of securities in the State Treasurer's Pooled investment program, including LAIF, generally is based on quoted market prices. The State Treasurer's Office performs a quarterly fair market valuation of the pooled investment program portfolio and a monthly fair market valuation of all securities held against carrying cost. These valuations and financial statements are posted to the State Treasurer's Office website at www.treasurer.ca.gov. The fair value of the County's investment in this pool is reported in the accompanying financial statements at amounts based upon the County's pro-rata share of the fair value provided by LAIF for the entire LAIF portfolio (in relation to the amortized cost of that portfolio). The balance available for withdrawal is based on the accounting records maintained by LAIF, which are recorded on an amortized cost basis. As of June 30, 2019, County of Riverside Asset Leasing Corporation (CORAL) had \$2.5 million and the Riverside University Health System – Medical Center had \$2.0 million for a total of \$4.5 million in LAIF. Also reported under restricted cash, Housing Authority had \$0.1 million in LAIF.

GASB Statement No. 79 establishes specific criteria used to determine whether a qualifying investment pool may elect to use an amortized cost exception to fair value measurement. Those criteria will provide qualifying external investment pools and participants in those pools with consistent application of an amortized cost-based measurement for financial reporting purposes. The statement also establishes additional note disclosures to qualifying external investment pools. There was no material impact on the County Treasurer's Investment Pool's Statement of Net Position as a result of the implementation of GASB Statement No. 79.

Investments Authorized by Debt Agreements

Investments of debt proceeds held by bond trustees are governed by provisions of the debt agreements of the respective component units, rather than the general provisions of the California Government Code or the County's investment policy. These provisions allow for the acquisition of investment agreements with maturities of up to 30 years.

Disclosures Relating to Interest Rate Risk

Interest rate risk is the measurement of how changes in market interest rates will adversely affect the fair value of an investment. Generally, the longer the maturity of an investment, the more sensitive to changes in market interest rates of its fair value. One of the ways the County Treasurer manages its exposure to interest rate risk is by purchasing a combination of shorter term and longer term investments and by timing cash flows from maturities so a portion of the portfolio is maturing, or coming close to maturity, to ensure the cash flow and liquidity required for operations.

NOTE 2 - CASH AND INVESTMENTS (Continued)

Custodial Credit Risk

Custodial credit risk for deposits is the risk that, in the event of the failure of a depository financial institution, a government will not be able to recover its deposits or will not be able to recover collateral securities that are in the possession of an outside party. The custodial credit risk for investments is the risk that, in the event of the failure of the counterparty (e.g., broker-dealer) to a transaction, a government will not be able to recover the value of its investment or collateral securities that are in the possession of another party. The California Government Code requires that a financial institution secure deposits made by State or local government units by pledging securities in an undivided collateral pool held by a depository regulated under State law (unless so waived by the governmental unit). The fair value of the pledged securities in the collateral pool must equal at least 110% of the total amount deposited by the public agencies. California law also allows financial institutions to secure County deposits by pledging first trust deed mortgage notes having a value of 150% of the secured public deposits. GASB Statement No. 40 requires that a disclosure is made with respect to custodial credit risks relating to deposits. The County has cash deposits with fiscal agents in excess of federal depository insurance limits held in collateralized accounts with securities held by Union Bank in the amount \$336 million. Investment securities are registered and held in the name of the County.

Concentration of Credit Risk

The investment policy of the County contains certain limitations on the amount that can be invested in any one issuer beyond that stipulated by the California Government Code. In accordance with GASB Statement No. 40, Deposits and Investment Risk Disclosures, the County should provide information about the concentration of credit risk associated with their investments in any one issuer that represent 5% or more of total County investments. These investments are identified on the investment table on page 5 of this report.

Credit Risk

Credit risk is the risk that an issuer of an investment will not fulfill its obligation to the holder of the investment. This is measured by the assignment of a rating by a nationally recognized statistical rating organization.

NOTE 3 - RESTRICTED CASH AND INVESTMENTS

The amount of assets restricted by legal and contractual requirements at June 30, 2019, is as follows (in thousands):

Governmental Activities				
General Fund			\$	411,861
Flood Control				1,904
Teeter Debt Service				32,515
Public Financing Authority - Capital Projects				9,612
Other Governmental Funds CORAL LAIF Restricted Cash and Other Investments District Court Financing Corporation Infrastructure Financing Authority Pension Obligation Inland Empire Tobacco Securitization Authority Public Financing Authority	\$ 2,538 10,686	\$ 13,224 1,063 11,464 4,714 13,029 1,411		3,012
Total Other Governmental Funds			-	44,905
Total Governmental Activities			4	500,797
Business-Type Activities			-	
Riverside University Health System - Medical Center LAIF		4.004		
Restricted Cash and Other Investments		1,964 26,447		
Total Riverside University Health System - Medical Center				28,411
Waste Resources Remediation Costs Closure and Post-Closure Care Costs Customer Deposits Advances from Grantors and 3rd Parties Deposit Payable Deferred Inflow of Resources		34,687 31,852 630 357 38 5,790		
Total Waste Resources				73,354
Housing Authority Section 8 Housing Choice Voucher HAP Restricted Cash and Other Investments		921 283		
Total Housing Authority				1,204
Other - Flood Control				3,363
Total Business-Type Activities				106,332
Total Restricted Cash and Investments			\$	607,129



BROWN ARMSTRONG

Certified Public Accountants

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE BASIC FINANCIAL STATEMENT PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

To the Board of Supervisors County of Riverside, California

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the Statement of Net Position of the Treasurer's Investment Pool of the County of Riverside (the County) as of June 30, 2019, and the related notes to the financial statement, which collectively comprise the Treasurer's Investment Pool's basic financial statement and have issued our report thereon dated February 25, 2020.

Internal Control Over Financial Reporting

In planning and performing our audit of the basic financial statement, we considered the County's internal control over financial reporting (internal control) relating to the County Treasurer's Investment Pool to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of the County's internal control relating to the County Treasurer's Investment Pool. Accordingly, we do not express an opinion on the effectiveness of the County's internal control relating to the County Treasurer's Investment Pool.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the County Treasurer's Investment Pool's basic financial statement is free of material misstatement, we performed tests of the County's compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the County's internal control or on compliance relating to the County Treasurer's Investment Pool. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the County's internal control and compliance relating to the County Treasurer's Investment Pool. Accordingly, this communication is not suitable for any other purpose.

Brown Armstrong
ACCOUNTANCY CORPORATION

Brown Armstrong

fecountancy Corporation

Bakersfield, California February 25, 2020