

TOWN OF CLARKSON
TOWN BOARD MEETING
March 10, 2015

The Town Board of the Town of Clarkson held their regular meeting on Tuesday, March 10, 2015 at the Clarkson Town Hall, 3710 Lake Road, Clarkson, NY at 6:00 PM.

PRESENT:

Paul Kimball	Supervisor
Allan Hoy	Councilperson
Christa Filipowicz	Councilperson
Patrick Didas	Councilperson
Jackie Smith	Councilperson
Sharon Mattison	Town Clerk
Robert Viscardi	Highway Supt.
Richard Olson	Attorney for the Town

ALSO:

Kristin Coon	Ass't to Supervisor
Chad Fabry	Building Insp/Code Enf.

**excused

Supervisor Kimball opened the meeting, and Sharon Mattison, Town Clerk led all those present in the Pledge of Allegiance. A moment of silence was observed for those serving in the military.

OPEN FORUM

Bill Andrews briefly discussed the two grants recently received by the Village of Brockport.

BROCKPORT AMBULANCE

Cody Dean distributed the 2014 Annual Report and reviewed key points, including statistics for 2015 to date. He reminded those present that Strong West now has a fully operational emergency department, not just an urgent care. He announced that Brockport Ambulance staff offers community CPR training classes at a cost of \$20 per person at the Seymour Library, the last Saturday of every month at 10:30 a.m. Brockport Ambulance is actively searching for a central location to house an ambulance base. Current staffed hours include one paramedic 24/7, an ALS tech 7 a.m. to 7 p.m., and overnights a volunteer with the paramedic. They are currently working on grants to assist in upgrading equipment.

EMPLOYEE HANDBOOK MODIFICATION

Postponed discussion to March 24th meeting.

DISCUSS REVISIONS LOCAL LAW #1-2015

Postponed discussion to March 24th meeting.

RESOLUTION SETTING PUBLIC HEARING

Introduced by: Hoy

Seconded by: Smith

INTRODUCTORY LOCAL LAW 1-2015
TOWN OF CLARKSON, MONROE COUNTY

**A LOCAL LAW TO PROVIDE FOR THE ORDERLY DEVELOPMENT OF
PROPERTY OWNED BY GOVERNMENT ENTITIES**

WHEREAS, the Town Board has before it a proposed Local Law to amend Chapters 116 and 140 of the Clarkson Code; and

WHEREAS, as required by law, the Town Board of the Town of Clarkson held a Public Hearing on January 13, 2015; and

03.10.15

WHEREAS, the Monroe County Planning Department requested modifications of said Local Law; and

WHEREAS, a Public Hearing is now required on the revised Local Law

NOW, THEREFORE, BE IT RESOLVED:

SECTION 1. That the Town Board of the Town of Clarkson shall hold and conduct a Public Hearing on the 14th day of January, 2015, at 6:00 p.m. at the Town Hall, 3710 Lake Road, Town of Clarkson, New York, 14430 to consider the attached Local Law; at which Public Hearing all interested persons will be heard concerning the subject matter thereof.

SECTION 2. That the Town Clerk shall cause due notice of such public hearing to be published as required by law.

VOTE OF THE BOARD

AYES: Supervisor Kimball, Councilpersons Hoy, Filipowicz, Didas and Smith

NAYS: None

***see attached Local Law #1-2015 revised at end of minutes**

DISCUSS BUDGET ADJUSTMENTS

Bob Fox was present to discuss budget adjustments. After a lengthy discussion he requested that the Town Board pass a resolution to transfer \$400,000 from the General Fund to the Highway Fund. He would like to schedule a planning workshop to discuss 2015 finances.

Of note, Mr. Fox reported that he just found out today that the Town is receiving an additional \$71,000 from NYS for Snow and Ice Contract.

RESOLUTION AUTHORIZING FUND TRANSFER

Motion by Councilperson Hoy

Seconded by Councilperson Didas

To authorize the transfer of \$400,000 from the General Fund to the Highway Fund.

Unanimously carried

MOTION TO ADOPT REVISED INVESTMENT POLICY

Motion by Councilperson Filipowicz

Seconded by Councilperson Didas

To adopt the revised Investment Policy.

Unanimously carried

***see attached Investment Policy at end of minutes**

MOTION AUTHORIZING SUPERVISOR TO SIGN FIREWORKS CONTRACT

Motion by Councilperson Smith

Seconded by Councilperson Didas

To authorize the Supervisor to sign the fireworks contract with Young Explosives Corp for fireworks display at Good Neighbor Day festival, Hafner Park.

Unanimously carried

MOTION AUTHORIZING SUPERVISOR AND TOWN CLERK TO SIGN LETTER RE: HIGHWAY SUPERINTENDENT OFFICE GRANT

Motion by Councilperson Didas

Seconded by Councilperson Smith

To authorize the Supervisor and Town Clerk to sign letter regarding remaining funding of Highway Supt. office grant.

Unanimously carried

Discussion: The letter states that the Town of Clarkson is committed to paying any cost over the \$75,000 DASNY grant amount to complete the office project. The funds used will be a 2015 general fund appropriation.

03.10.15

DISCUSS EMAIL USAGE

A brief discussion took place regarding the use of "Office 365". Harold Mundy, Fire District Treasurer stated that the Brockport Fire Dept is also considering the use of the program. Further discussion is postponed to the March 24th meeting.

AUTHORIZE HIGHWAY SUPT. TO ATTEND PERMA CONFERENCE

Motion by Councilperson Smith

Seconded by Councilperson Filipowicz

To authorize the Highway Supt. to attend the PERMA conference in May. Overnight accommodations are at no cost to the Town.

Unanimously carried

MOTION ACKNOWLEDGING RECEIPT OF SUPERVISOR'S FINANCIAL REPORT

Motion by Councilperson Filipowicz

Seconded by Councilperson Didas

Acknowledging receipt of Supervisor's Financial Report.

Unanimously carried

TOWN CLERK REPORTS

S. Mattison distributed an updated summary on lodge rentals to date, reported the sale of 415 transfer station permits and anticipates the sale of an additional 30.

BUILDING INSPECTOR REPORTS

C. Fabry gave an update on Carl Grasta's professional building project. In addition, he reported that Autumn Woods, Section 5 is underway.

HIGHWAY SUPERINTENDENT REPORTS

B. Viscardi reported that staff is thankful for a break from snow cleanup. They have been working on small projects around Town, including the new front door at the Town Hall. He recently attended Advocacy Day in Albany to try to secure more money for our CHIPS program (Consolidated Highway Improvement Program). Clarkson receives \$24,000, one of the lowest towns and this figure has been constant for ten years. Apparently there will be no changes this year across the state. We did receive \$4,000 extra last year because of the severe winter and will receive an additional \$4,000 again this year, giving us a total of \$28,000. To follow-up on Bob Fox's report, NYS owes Clarkson \$71,000 for the 2013-14 Snow and Ice Contract. B. Viscardi sent a letter to Senator Robach requesting this payment and per Senator Robach's response, we should receive those funds within two weeks. Update snow removal statistics, as of 3/6/15: Plows have traveled 102,309 miles and used 2,200 tons of salt.

MINUTES

Motion by Councilperson Didas

Seconded by Councilperson Smith

To approve February 24, 2015 minutes.

VOTE OF THE BOARD

AYES: Supervisor Kimball, Councilpersons Hoy, Didas and Smith

NAYS: None

ABSTAIN: Councilperson Filipowicz

AUDIT—03-01-2015

Motion by Councilperson Hoy

Seconded by Councilperson Smith

To authorize payment of audit 03-01-2015 to include the following:

Vouchers 20150191-20150231; Total \$47,294.68; Gen. \$19,765.20; Hwy. \$23,744.12;

SL \$3,785.36

For distribution checks from 27140 - 27178

Unanimously carried

03.10.15

EXECUTIVE SESSION

Motion by Councilperson Didas

Seconded by Councilperson Filipowicz

To enter executive session at 6:40 P.M. to discuss a personnel matter.

Unanimously carried

RETURN TO REGULAR SESSION

Motion by Councilperson Hoy

Seconded by Councilperson Smith

To return to regular session at 7:09 P.M.

Unanimously carried

MOTION TO ADJOURN

Motion to adjourn at 7:10 P.M. by Councilperson Didas

Seconded by Councilperson Hoy

Unanimously carried

Respectfully submitted,

Sharon S. Mattison

Town Clerk

APPROVED 03-24-2015

Introductory Local Law # 1-2015

**A LOCAL LAW TO PROVIDE FOR THE ORDERLY DEVELOPMENT OF
PROPERTY OWNED BY GOVERNMENT ENTITIES**

Be it enacted by the Town Board of the Town of Clarkson:

Section 1. This Local Law is enacted pursuant to the authority contained in Article 2 of the Municipal Home Rule Law of the State of New York and Article 16 of the New York State Town Law.

Section 2. That the purpose of this Local Law is to provide for limited exemption from Zoning and Subdivision laws and regulations for property owned by government entities.

Section 3. §140-15 of the Clarkson Code is amended to read as follows:

Land which is owned by fire districts, public school districts, the Town of Clarkson, the County of Monroe, the State of New York or the United States of America may be used for the governmental purposes

which are permitted under the laws which govern said entities and shall be exempt from further regulation under this chapter.

Section 4. §116-39 of the Clarkson Code is amended to read as follows:

It is the policy of the Town of Clarkson that developers should pay their own way. Therefore, the fair and reasonable costs incurred by the Town in reviewing applications and for inspecting improvements which will be dedicated to the Town will be the responsibility of the developer.

Section 5. Severability. The invalidity of any section or provision of this local law shall not invalidate any other section or provision thereof.

Section 6. That this local law shall take effect immediately.

Revised per MCPD 3-10-15

TOWN OF CLARKSON Investment Policy

I. SCOPE

This investment policy applies to all moneys and other financial resources available for deposit and investment by the Town of Clarkson on its own behalf or on behalf of any other entity or individual.

II. OBJECTIVES

The primary objectives of the local government's investment activities are, in priority order:

- To conform with all applicable federal, State and other legal requirements (legality)
- To adequately safeguard principal (safety)
- To provide sufficient liquidity to meet all operating requirements (liquidity)
- To obtain a reasonable rate of return (yield).

III. DELEGATION OF AUTHORITY

The governing board's responsibility for administration of the investment program is delegated to the Town Supervisor who shall establish written procedures for the operation of the investment program consistent with these investment policies. Such procedures shall include internal controls to provide a satisfactory level of accountability based upon records incorporating the description and amounts of investments, the fund(s) for which they are held, the place(s) where kept, and other relevant information, including dates of sale or other dispositions and amounts realized. In addition, the internal control procedures shall describe the responsibilities and levels of authority for key individuals involved in the investment program.

IV. PRUDENCE

All participants in the investment process shall seek to act responsibly as custodians of the public trust and shall avoid any transaction that might impair public confidence in the Town of Clarkson to govern effectively.

Investments shall be made with prudence, diligence, skill, judgment, and care, under circumstances then prevailing, which knowledgeable and prudent persons acting in like capacity would use, not for speculation, but for investment, considering the safety of the principal as well as the probable income to be derived.

All participants involved in the investment process shall refrain from personal business activity that could conflict with proper execution of the investment program, or which could impair their ability to make impartial investment decisions.

V. DIVERSIFICATION

It is the policy of the Town of Clarkson to diversify its deposits and investments by financial institution, by investment instrument, and by maturity scheduling.

The governing board shall establish appropriate limits for the amount of investments which can be made with each financial institution or dealer, and shall evaluate this listing at least annually.

VI. INTERNAL CONTROLS

It is the policy of the Town of Clarkson for all moneys collected by any officer or employee of the government to transfer those funds to the Town Supervisor (chief fiscal officer) within 30 days of deposit, or within the time period specified in law, whichever is shorter.

The Town Supervisor is responsible for establishing and maintaining internal control procedures to provide reasonable, but not absolute, assurance that deposits and investments are safeguarded against loss from unauthorized use or disposition, that transactions are executed in accordance with management's authorization, properly recorded, and managed in compliance with applicable laws and regulations.

VII. DESIGNATION OF DEPOSITARIES

The banks and trust companies that are authorized for the deposit of moneys, and the maximum amount which may be kept on deposit at any time, are:

Depository Name	Maximum Amount	Officer
JPMorgan Chase	\$2,000,000	Paul Kimball
First Niagara Bank	\$2,000,000	Paul Kimball
Citizens Bank	\$2,000,000	Paul Kimball
Five Star Bank	\$3,000,000	Paul Kimball
Manufacturers and Traders Trust Company	\$3,000,000	Paul Kimball

VIII. SECURING DEPOSITS AND INVESTMENTS

All deposits and investments at a bank or trust company, including all demand deposits, certificates of deposit and special time deposits (hereinafter, collectively, "deposits") made by officers of *Town of Clarkson* that are in excess of the amount insured under the provisions of the Federal Deposit Insurance Act shall be secured by:

A pledge of "eligible securities" with an aggregate "market value" (as provided by the GML Section 10) that is at least equal to the aggregate amount of deposits by the officers. See Schedule A of this policy for a listing of "eligible securities."

IX. COLLATERALIZATION AND SAFEKEEPING

Eligible securities used for collateralizing deposits made by officers of Town of Clarkson shall be held by (the depository or a third party) bank or trust company subject to security and custodial agreements.

The security agreement shall provide that eligible securities are being pledged to secure such deposits together with agreed-upon interest, if any, and any costs or expenses arising out of the collection of such deposits upon a default. It shall also provide the conditions under which the securities (or pro rata portion of a pool of eligible securities) may be sold, presented for payment, substituted or released and the events which will enable the local government to exercise its rights against the pledged securities.

In the event that the pledged securities are not registered or inscribed in the name of the Town of Clarkson, such securities shall be delivered in a form suitable for transfer or with an assignment in blank to the Town of Clarkson or the custodial bank or trust company. Whenever eligible securities delivered to the custodial bank or trust company are transferred by entries on the books of a federal reserve bank or other book-entry system operated by a federally regulated entity without physical delivery of the evidence of the obligations, then the records of the custodial bank or trust company shall be required to show, at all times, the interest of the government in the securities (or the pro rata portion of a pool of eligible securities) as set forth in the security agreement.

The custodial agreement shall provide that pledged securities will be held by the bank or trust company as agent of, and custodian for, the Town of Clarkson will be kept separate and apart

from the general assets of the custodial bank or trust company and will not be commingled with or become part of the backing of any other deposit or other bank liability. The agreement shall also describe how the custodian shall confirm the receipt, substitution, or release of the collateral and it shall provide for the frequency of revaluation of collateral by the custodial bank or trust company and for the substitution of collateral when a change in the rating of a security causes ineligibility. The security and custodial agreements shall also include all other provisions necessary to provide the Town of Clarkson with a perfected security interest in the eligible securities and to otherwise secure the local government's interest in the collateral, and may contain other provisions that the governing board deems necessary.

X. PERMITTED INVESTMENTS

As provided by General Municipal Law Section 11, the Clarkson Town Board authorizes the Town Supervisor to invest moneys not required for immediate expenditure for terms not to exceed its projected cash flow needs in the following types of investments:

- Special time deposit accounts in, or certificates of deposit issued by, a bank or trust company located and authorized to do business in the State of New York
- Obligations of the United States of America
- Obligations guaranteed by agencies of the United States of America, where the payment of principal and interest are guaranteed by the United States of America
- Obligations of the State of New York
- With the approval of the State Comptroller, obligations issued pursuant to Local Finance Law Section 24.00 or 25.00 (i.e., Tax Anticipation Notes and Revenue Anticipation Notes) by any municipality, school district or district corporation in the State of New York other than the (unit of government)
- Obligations of the (unit of government), but only with moneys in a reserve fund established pursuant to General Municipal Law Section 6-c, 6-d, 6-e, 6-f, 6-g, 6-h, 6-j, 6-k, 6-l, 6-m, or 6-n.

All investment obligations shall be payable or redeemable at the option of the (unit of government) within such times as the proceeds will be needed to meet expenditures for purposes for which the moneys were provided and, in the case of obligations purchased with the proceeds of bonds or notes, shall be payable or redeemable in any event at the option of the (unit of government) within two years of the date of purchase. Time deposit accounts and certificates of deposit shall be payable within such times as the proceeds will be needed to meet expenditures for which the moneys were obtained, and shall be secured as provided in Sections VIII and IX herein.

Except as may otherwise be provided in a contract with bondholders or noteholders, any moneys of the (unit of government) authorized to be invested may be commingled for investment purposes, provided that any investment of commingled moneys shall be payable or redeemable at the option of the (unit of government) within such time as the proceeds shall be needed to meet expenditures for which such moneys were obtained, or as otherwise specifically provided in General Municipal Law Section 11. The separate identity of the sources of these funds shall be maintained at all times and income received shall be credited on a pro rata basis to the fund or account from which the moneys were invested.

Any obligation that provides for the adjustment of its interest rate on set dates is deemed to be payable or redeemable on the date on which the principal amount can be recovered through demand by the holder.

XI. AUTHORIZED FINANCIAL INSTITUTIONS AND DEALERS

All financial institutions and dealers with which the Town of Clarkson transacts business shall be creditworthy, and have an appropriate level of experience, capitalization, size, and other factors that make the financial institution or the dealer capable and qualified to transact business with the Town of Clarkson. The Town Supervisor shall evaluate the financial position and maintain a listing of proposed depositaries, trading partners, and custodians. Recent Reports of Condition and Income (call reports) shall be obtained for proposed banks, and security dealers that are not affiliated with a bank shall be required to be classified as reporting dealers affiliated with the New York Federal Reserve Bank, as primary dealers.

The Town of Clarkson shall maintain a list of financial institutions and dealers approved for investment purposes, and establish appropriate limits to the amounts of investments that can be made with each financial institution or dealer.

XII. PURCHASE OF INVESTMENTS

The Town Supervisor is authorized to contract for the purchase of investments:

1. Directly, from an authorized trading partner
2. By participation in a cooperative investment agreement with other authorized municipal

corporations pursuant to Article 5-G of the General Municipal Law and in accordance with Article 3-A of the General Municipal Law.

All purchased obligations, unless registered or inscribed in the name of the local government, shall be purchased through, delivered to and held in the custody of a bank or trust company. Such obligations shall be purchased, sold, or presented for redemption or payment by such bank or trust company only in accordance with prior written authorization from the officer authorized to make the investment. All such transactions shall be confirmed in writing to the Town of Clarkson by the bank or trust company.

Any obligation held in the custody of a bank or trust company shall be held pursuant to a written custodial agreement as described in General Municipal Law Section 10(3)(a). The agreement shall provide that securities held by the bank or trust company, as agent of, and custodian for, the Town of Clarkson will be kept separate and apart from the general assets of the custodial bank or trust company and will not be commingled with or become part of the backing of any other deposit or other bank liability. The agreement shall also describe how the custodian shall confirm the receipt and release of the securities. Such agreement shall include all provisions necessary to secure the local government's perfected interest in the securities, and the agreement may also contain other provisions that the governing board deems necessary. The security and custodial agreements shall also include all other provisions necessary to provide the Town of Clarkson with a perfected interest in the securities.

The Town Supervisor shall can direct the bank or trust company to register and hold the evidences of investments in the name of its nominee, or may deposit or authorize the bank or trust company to deposit, or arrange for their deposit with a federal reserve bank or other book-entry transfer system operated by a federally regulated entity. The records of the bank or trust company shall show, at all times, the ownership of such evidences of investments, and they shall be, when held in the possession of the bank or trust company, at all times, kept separate from the assets of the bank or trust company. All evidences of investments delivered to a bank or trust company shall be held by the bank or trust company pursuant to a written custodial agreement as set forth in General Municipal Law Section 10(3)(a), and as described earlier in this section. When any such evidences of investments are so registered in the name of a nominee, the bank or trust company shall be absolutely liable for any loss occasioned by the acts of such nominee with respect to such evidences of investments.

XIII. COURIER SERVICE

The Town Supervisor may, subject to the approval of the governing board by resolution, enter into a contract with a courier service for the purpose of causing the deposit of public funds with a bank or trust company. The courier service shall be required to obtain a surety bond for the full amount entrusted to the courier, payable to the Town of Clarkson and executed by an insurance company authorized to do business in the State of New York, with a claims-paying ability that is rated in the highest rating category by at least two nationally recognized statistical rating organizations, to insure against any loss of public deposits entrusted to the courier service for deposit or failure to deposit the full amount entrusted to the courier service.

The Town of Clarkson may agree with the depository bank or trust company that the bank or trust company will reimburse all or part of, but not more than, the actual cost incurred by the (unit of government) in transporting items for deposit through a courier service. Any such reimbursement agreement shall apply only to a specified deposit transaction, and may be subject to such terms, conditions and limitations as the bank or trust company deems necessary to ensure sound banking practices, including, but not limited to, any terms, conditions or limitations that may be required by the banking department or other federal or State authority.

XIV. ANNUAL REVIEW AND AMENDMENTS

The Town of Clarkson shall review this investment policy annually, and it shall have the power to amend this policy at any time.

XV. DEFINITIONS

The terms "public funds," "public deposits," "bank," "trust company," "eligible securities," "eligible surety bond," and "eligible letter of credit" shall have the same meanings as set forth in General Municipal Law Section 10.

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| (i) Obligations issued, or fully insured or guaranteed as to the payment of principal and interest, by the United States of America, an agency thereof or a United States government-sponsored corporation. | 100% |
| (ii) Obligations issued or fully guaranteed by the International Bank for Reconstruction and Development, the Inter-American Development Bank, the Asian Development Bank, and the African Development Bank. | 100% |

(iii) Obligations partially insured or guaranteed by any agency of the United States of America, at a proportion of the market value of the obligation that represents the amount of the insurance or guaranty.	100%
(iv) Obligations issued or fully insured or guaranteed by the State of New York, obligations issued by a municipal corporation, school district or district corporation of this State or obligations of any public benefit corporation which under a specific State statute may be accepted as security for deposit of public moneys.	100%
(v) Obligations issued by states (other than the State of New York) of the United States rated in one of the three highest rating categories by at least one nationally recognized statistical rating organization.	100% if rated in the highest category; 90% for 2nd highest; 80% for 3rd highest.
(vi) Obligations of the Commonwealth of Puerto Rico rated in one of the three highest rating categories by at least one nationally recognized statistical rating organization.	100% if rated in the highest category; 90% for 2nd highest; 80% for 3rd highest.
(vii) Obligations of counties, cities and other governmental entities of another state having the power to levy taxes that are backed by the full faith and credit of such governmental entity and rated in one of the three highest rating categories by at least one nationally recognized statistical rating organization.	100% if rated in the highest category; 90% for 2nd highest; 80% for 3rd highest.
(viii) Obligations of domestic corporations rated in one of the two highest rating categories by at least one nationally recognized statistical rating organization.	80%
(ix) Any mortgage-related securities, as defined in the Securities Exchange Act of 1934, as amended, which may be purchased by banks under the limitations established by federal bank regulatory agencies.	70%
(x) Commercial paper and bankers' acceptances issued by a bank (other than the bank with which the money is being deposited or invested) rated in the highest short-term category by at least one nationally recognized statistical rating organization and having maturities of not longer than 60 days from the date they are pledged.	80%
(xi) Zero-coupon obligations of the United States government marketed as "Treasury STRIPS."	80%

Appendix C—Repurchase Agreements Repurchase Agreements (REPOs) are complex transactions that can expose the investing local government to serious risks. Investing officers must have the resources to negotiate these complex agreements with trading partners and custodial banks or trust companies, and to monitor the investment daily. If a local government has a relatively small portfolio or limited staff resources, use of REPOs may not be appropriate. Investing officers should make sure that the legal counsel for the local government reviews all REPO documents.

Among other things, a REPO should comply with the following:

- Trading partners should be limited to creditworthy banks or trust companies located and authorized to do business in New York State or to registered primary dealers.
- Unless the obligations that are purchased pursuant to the REPO are registered or inscribed in the name of the local government, obligations must be purchased through, delivered to and held in the custody of a bank or trust company located and authorized to do business in New York State (the custodial bank or trust company should not be the seller of the obligations that are the subject of the REPO).
- The local government must enter into a master REPO, outlining basic responsibilities and liabilities of the buyer and seller, and a written agreement with the custodial bank or trust company, outlining the basic responsibilities and liabilities of the buyer, seller, and custodian.
- The custodial agreement should provide that the custodian takes possession and maintains custody of the obligations exclusively for the local government, that the obligations are free of any claims against the trading partner, and that any claims by the custodian are subordinate to the local government's claims or rights to those obligations.
- The obligations must be credited to the local government on the records of the custodial bank or trust company, and the transaction must be confirmed in writing to the local

government by the custodial bank or trust company.

- The obligations purchased by the local government may only be sold or presented for redemption or payment by the local government's custodian upon written instructions of the investing officer of the local government.
- The local government must obtain a perfected security interest in the obligation.
- Agreements should be for short periods of time (no more than 30 days).
- The local government should determine whether to include margin requirements.
- No substitution of obligations is permitted.
- Payment for the purchased obligations should not be made by the custodial bank or trust company until the obligations are actually received (usually done simultaneously).

Obligations that are purchased pursuant to a REPO are deemed to be payable or redeemable, for purposes of the GML, on the date on which the purchased obligations are scheduled to be repurchased by the seller.²⁷

²⁷ It is the view of the Office of the State Comptroller that leveraging of assets through the use of "reverse repurchase agreements" constitutes an unauthorized form of borrowing not permitted by the Local Finance Law.