LEGISLATIVE, FINANCE, AND ADMINISTRATION COMMITTEE
AGENDA

MAY 11, 2015 - 5:30 P.M.

CITY HALL COUNCIL CHAMBERS
15 LOOCKERMAN PLAZA
DOVER, DELAWARE

PUBLIC COMMENTS ARE WELCOMED ON ANY ITEM AND WILL BE PERMITTED AT APPROPRIATE TIMES. WHEN POSSIBLE, PLEASE NOTIFY THE CITY CLERK (736-7008 OR E-MAIL AT CITYCLERK@DOVER.DE.US) SHOULD YOU WISH TO BE RECOGNIZED.

AGENDA ADDITIONS/DELETIONS

1. **PROPOSED ORDINANCES**
   - **A. #2015-09 AMENDING CHAPTER 62 - LAW ENFORCEMENT, ARTICLE II - POLICE DEPARTMENT, CHAPTER 106 - TRAFFIC AND VEHICLES, ARTICLE III - STOPPING, STANDING AND PARKING, DIVISION 2 - METERED PARKING, AND APPENDIX F - FEES AND FINES**
     (STAFF RECOMMENDS ADOPTION OF ORDINANCE #2015-09)
   - **B. THIRD BUDGET AMENDMENT - RATE STABILIZATION FUND**
     (STAFF RECOMMENDS APPROVAL OF THE PROPOSED THIRD AMENDMENT TO THE BUDGET ORDINANCE)

2. **EVALUATION OF PROPOSAL - INVESTMENT BANKING CUSTODY SERVICES**
   (DURING THEIR MEETING OF APRIL 27, 2015 THE COMMITTEE RECOMMENDED THAT STAFF CONTACT ALL RESPONDING BANKS TO REQUEST THEIR BEST AND FINAL OFFERS FOR INVESTMENT BANKING CUSTODY SERVICES FOR A THREE (3) YEAR PERIOD TO START THE DATE OF CONTRACT AND MAY BE RENEWED OR EXTENDED FOR TWO (2) ADDITIONAL TWO (2) YEAR PERIODS BY MUTUAL CONSENT AND APPROVAL OF CITY COUNCIL)(STAFF RECOMMENDS AWARDING THE INVESTMENT CUSTODY SERVICES TO WILMINGTON TRUST FOR A THREE (3) YEAR PERIOD TO START THE DATE OF CONTRACT AND MAY BE RENEWED OR EXTENDED FOR TWO (2) ADDITIONAL TWO (2) YEAR PERIODS BY MUTUAL CONSENT AND APPROVAL OF CITY COUNCIL)

3. **ADJOURNMENT BY 7:00 P.M.**

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S:\AGENDAS-MINUTES-PACKETS-PRESENTATIONS-ATT&EXH\COMMITTEE-AGENDAS\2015\05-11-2015 LF&A.WPD

THE AGENDA ITEMS AS LISTED MAY NOT BE CONSIDERED IN SEQUENCE. THIS AGENDA IS SUBJECT TO CHANGE TO INCLUDE THE ADDITION OR THE DELETION OF ITEMS, INCLUDING EXECUTIVE SESSIONS.

CITY OF DOVER PROPOSED ORDINANCE #2015-09

BE IT ORDAINED BY THE MAYOR AND COUNCIL OF THE CITY OF DOVER, IN COUNCIL MET:

That Chapter 62 - Law Enforcement, Article II - Police Department, of the Dover Code be amended by deleting the text indicated in red strikeout and inserting the bold, blue text, as follows:

Sec. 62-31. - Generally.

(a) *Established*. There shall be a city police department, which shall preserve peace and order and, within the city limits, compel obedience to all city ordinances**, state,** and **federal laws** ~~**the law**~~.

(b) *Officers*. The city council shall, upon adoption of the annual budget, designate the number and salaries of the individual police officers who shall comprise the police department. The ~~**mayor**~~ **police chief** shall choose and appoint the **deputy police chief and** police officers.

(Code 1968, § 2-32; Code 1981, § 18-1; Ord. of 11-26-1990, § 4)

Sec. 62-32. - Chief of police generally.

(a) *Designation*. ~~**One of the regular members of the police department shall be designated by the mayor to serve as chief of police.**~~ **A police chief selection committee comprised of the mayor, council president, chair of the safety advisory and transportation committee, city manager, and human resources director shall advise the mayor on the nomination of the police chief. The mayor shall nominate a duly qualified chief of police, whose appointment shall be effective upon confirmation by the city council. The chief of police shall be subject to removal at any time by the mayor, with the affirmative vote of two-thirds of the members elected to the city council, in accordance with applicable laws.**

(b) *Functions*. The chief of police shall have the authority to supervise and direct the police department and, pursuant to such authority, he shall promulgate police department rules and regulations, three copies of which are on file at the police department.

(c) *Reports*. The chief of police shall submit monthly reports to the city council giving the number of arrests and other pertinent information required by the city council.

(Code 1968, §§ 2-40, 2-41, 2-44; Code 1981, § 18-1.1)

Sec. 62-33. - Oath of police officers.

Every police officer, before entering upon his duties, shall be sworn by the mayor to perform his duties faithfully.

(Code 1968, § 2-35; Code 1981, § 18-2)

Sec. 62-34. - Enforcement of laws and ordinances.

It shall be the duty of each police officer to diligently inquire into the observance of the laws and ordinances within the city and, in case of a breach, to cause the offender to be legally proceeded against.

(Code 1968, § 2-36; Code 1981, § 18-3)

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Sec. 62-35. - Authority to preserve order at fires.

The police department shall have the authority, upon an alarm of fire, to report to the scene of a fire to preserve order and render any assistance to the fire department that may be practical.

(Code 1968, § 2-38; Code 1981, § 18-4)

Sec. 62-36. - Disciplinary authority of chief of police.

(a) *Generally*. The chief of police shall have final disciplinary authority and responsibility within the police department, subject to appeals to the mayor, and shall promulgate and carry out such disciplinary procedures as may be needed within his command. The chief of police shall, where cause exists, have the authority to suspend from duty an employee for a period of time not to exceed 30 days, to reduce employees in rank or pay grade, to place employees on probation and to suspend such sanctions as the need arises, or to dismiss an employee from service.

(b) *Appeal*. Any employee so disciplined has the right to appeal, on the record, to the mayor.

(c) *Subpoenas*. The chief of police~~, with approval from the mayor,~~ shall, for the limited purpose of compelling the appearance of witnesses before the professional standards board of the city police department, sitting for the purpose of affording due process to members of the city police department in disciplinary matters, have the power to issue subpoenas for that purpose.

(Code 1968, §§ 2-42, 2-43; Code 1981, § 18-5; Ord. of 10-28-1985; Ord. of 3-10-1986)

Sec. 62-37. - Mayor to advise council of personnel changes.

The mayor shall advise the city council of any change in the personnel of the police department at the next regular city council meeting following the change.

(Code 1968, § 2-33; Code 1981, § 18-5.1)

~~**Sec. 62-38. - Special police.**~~

~~(a) *Appointment*. Whenever, in the opinion of the mayor, an emergency exists, he shall have the power to appoint one or more special police officers, with all the powers and authority of regular police officers, during the period of the emergency.~~

~~(b) *Term*. The special police officers shall not serve for a term of more than 30 days without the approval of the city council.~~

~~(Code 1968, § 2-34; Code 1981, § 18-6)~~

Sec. 62-38. - Police cadet program.

(a) *Created; purpose*. Due to the continuing safety and security concerns expressed by merchants, patrons, and residents in the downtown area, city council has authorized the Police Cadet Program to maintain a more visible presence in the downtown area. The city manager and police chief shall expand or contract the number of police cadets at their mutual discretion. The objectives of the Police Cadet Program are to:

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1. **Allow downtown merchants to build a rapport with the police cadets, allowing the police cadets to understand their needs.**
2. **Provide additional patrols to curb loitering, alcohol violations and pan handlers.**
3. **Provide additional patrols to curb noise ordinance violations (loud music from vehicles).**
4. **Provide additional patrols to curb harassment complaints.**
5. **Provide additional patrols in the Dover Public Library.**
6. **Allow the police department to screen and vet the police cadets for future employment as Dover police officers.**
7. **Provide a feeling of safety to the downtown patrons, as well as the downtown merchants.**

(b) *Appointment*. The chief of police shall assign the authorized number of duly qualified individuals to the Police Cadet Program. The cadets shall be civilian employees of the police department and shall not be considered law-enforcement officers within the meaning of 11 Del. C. Ch. 92 - Law-Enforcement Officers' Bill of Rights.

(c) *Authority*. The police cadets shall have the authority to issue summonses for violations of any ordinance of the City of Dover. The police cadets shall not have the authority to enforce the Delaware Code or make arrests for violations of the Delaware Code.

(d) *Oath*. Every police cadet, before entering upon his or her duties, shall take an oath to faithfully perform his or her duties.

Sec. 62-39. - Sale of property.

(a) *Authorized*. The chief of police shall have the authority to ~~hold a sale~~ **dispose** of personal property held by the police department for a period in excess of one year, which said personal property shall be unclaimed evidence, lost and found articles, confiscated articles and any other items of personal property which have come into the hands of the members of the police department and have been held for a period of one year, if the owner or owners of the same shall be unknown or said property has been unclaimed.

(b) ~~*Auction*~~ ***Disposal***. The chief of police shall ~~cause to be sold~~ **dispose of** the said property **in accordance with the disposition policy and procedures as established by the City's Finance Department.** ~~at a public auction and shall advertise by publishing notice of said sale in one issue of a newspaper circulated in the city at least ten days before the date of the sale, which said notice shall merely state that a sale of unclaimed personal property shall be held by the police department, giving the date, time and place of said sale without specifying any of the items to be sold.~~ The proceeds of said sale shall be retained by the ~~police department~~ **City** to be used solely for **police** pensions **as established in Section 62-74(d).** ~~of the police department.~~

(Code 1968, § 2-44.1; Ord. of 10-28-1974, § 1; Code 1981, § 18-7; Ord. of 7-14-2003)

Secs. 62-40-62-70. - Reserved.

BE IT FURTHER ORDAINED:

That Chapter 106 - Traffic and Vehicles, Article III - Stopping, Standing and Parking, Division 2 - Metered Parking, be amended by deleting the text indicated in red strikeout and inserting the bold, blue text, as follows:

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Sec. 106-163. - Use of meters required.

(a) *Deposit coin*. Upon entering a parking meter zone when the parking meter regulations are in effect, the operator of a vehicle shall immediately deposit the required coin in the parking meter situated at the parking space and operate the meter according to the instructions thereon. **Failure to deposit the required coin in the parking meter shall result in a fine as provided for in Appendix F - Fees and Fines.**

(b) *Coins accepted*. All parking meters shall be adjusted so that when properly operated, coins may be deposited at any time throughout the time range of the meters, with each coin permitting the vehicle to be parked for a period as provided for in Appendix F-Fees and Fines.

(c) *Overtime parking*. It shall be unlawful for any person to allow a vehicle to remain parked in a parking meter zone for a period of time in excess of that prescribed in subsection (b) of this section for the particular amount deposited. It shall be prima facie evidence of an overtime parking violation when the parking meter shall indicate by proper signal that the lawful parking period has expired.

(d) *Exceptions*. The use of parking meters shall not be required on Sundays and legal holidays.

(Code 1968, §§ 31-73, 31-74; Code 1981, § 13-48; Ord. No. 2009-09, 6-22-2009)

Sec. 106-164. - Violations; penalties.

(a) *Generally*. Any person convicted of violating the provisions of this ~~division~~ **article** or of aiding, abetting or assisting in the violation of said provisions shall be sentenced to pay a fine as provided for **in** Appendix F—Fees and Fines. ~~**After the expiration of 24 hours, the violator may pay the sum as provided for Appendix F—Fees and Fines, if payment is made voluntarily prior to the time and date set forth in the summons.**~~

~~**(b) *Fourth violation*. Any person committing a fourth violation within any 30-day period of the provisions of this division within one hour from the time that the summons giving notice of the violation is issued, may pay as provided for Appendix F—Fees and Fines. After the expiration of one hour from the issuance of the summons, the violator may pay each such violation as provided for Appendix F—Fees and Fines, if payment is made voluntarily prior to the time and date set forth in the summons.**~~

~~**(c) *Fifth violation, etc*. Any person committing more than four violations within any 30-day period of the provisions of this division may pay the sum as provided for Appendix F—Fees and Fines, if payment is made voluntarily prior to the time and date set forth in the summons.**~~

~~**(d)**~~ **(b)** *Enhanced civil enforcement authority*. If five or more violations of this article have been issued to a vehicle and those violations are more than 30 days past due, or if accumulated unpaid violations of this article exceed more than ~~**$200.00**~~ **$100.00**, the vehicle shall be subject to enhanced civil enforcement, as follows:

(1) Such vehicle found parked on any street in the city shall be immobilized by any police officer or parking enforcement employee of this city in such manner as to prevent its operation. Any vehicle so immobilized or impounded shall not be released to its lawful owner until all unpaid violations and applicable administrative fees issued to such owner have been discharged by payment in full, together with payment for the costs of immobilizing, releasing, and storing such vehicle. The owner shall sign a receipt for such vehicle. Payment

for any such towing shall be in accordance with the towing costs outlined in the current agreement between the police department and the towing operator. If the vehicle is a tractor-trailer combination, the trailer may be released to an authorized agent if the tractor-trailer is immobilized pursuant to this section.

(2) In any case involving immobilization of a vehicle pursuant to this section, the police officer or parking enforcement employee shall place on such vehicle, in a conspicuous manner, notice sufficient to warn any individual that such vehicle has been immobilized and that any attempt to move such vehicle might result in damage to such vehicle.

(3) Any vehicle remaining immobilized and not released for 120 hours may be towed and impounded at the direction of a police officer or parking enforcement employee.

(4) Any person who unlawfully removes a device for immobilization of a vehicle shall be fined as provided for in Appendix F—Fees and Fines.

(5) Any person who tows or otherwise moves an immobilized vehicle without authorization by the chief of police or his designee shall be fined as provided for in Appendix F—Fees and Fines.

~~(c)~~**(c)** *Cost*. No cost will be assessed if payment of the penalty as hereinbefore imposed is voluntarily paid without the necessity of a hearing before the proper official.

(Code 1968, § 31-77; Ord. of 8-25-1971, § 1; Code 1981, § 13-49; Ord. No. 2009-09, 6-22-2009; Ord. No. 2011-22, 9-26-2011)

BE IT FURTHER ORDAINED:

That Appendix F - Fees and Fines, of the Dover Code be amended by deleting the text indicated in red strikeout and inserting the bold, blue text, as follows:

Chapter 106—Traffic and Vehicles, Article III—Stopping, Standing and Parking, Division 1—Generally			
Sec. 106-135	Residential parking		
	Subsec. (i)(1)	Expiration; Two-hour parking	~~Display of an expired sticker while in violation of the two-hour parking limit requirement will result in a $15.00~~ **$20.00** fine or ~~$10.00~~ **$15.00** if paid within 72 hours of issuance of such fine
	Subsec. (i)(2)	Expiration; Change of residence, etc.	~~Display of a sticker which has become ineligible due to a change of residence, status or any other reason (i.e., sells, leases, lends, etc.) while in violation of the two-hour parking limit requirement will result in a $15.00~~ **$20.00** fine or ~~$10.00~~ **$15.00** if paid within 72 hours of issuance of such fine

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	Subsec. (m)	Violations; penalties	Any violation of this section not having a stated, specified penalty will result in a ~~$15.00~~ **$20.00** fine or ~~$10.00~~ **$15.00** if paid within 72 hours of issuance of such fine
Sec. 106-137	Parking areas for persons with disabilities		
	Subsec. (c)(3)	Signage; Fines	Failure to achieve compliance within 30 calendar days of the issuance of the notice of violation shall be subject to the fines set forth in subsection (f) of this section
	Subsec. (f)	Penalties	Whoever violates this section shall be fined not less than the minimum fine as defined in 21 Del. C. § 4183 at the time the violation occurred
Chapter 106—Traffic and Vehicles, Article III—Stopping, Standing and Parking, Division 2—Metered Parking			
Sec. 106-163	Use of meters required		
	Subsec. (a)	**Failure to deposit the required coin in the parking meter**	**$20.00 fine or $15.00 if paid within 72 hours of issuance of such fine**
	Subsec. (b)	Coins accepted	
		Each ~~$0.01~~ **$0.25** coin	Permits the vehicle to be parked for a period of ~~12 minutes~~ **one hour**
		Each ~~$0.05 coin~~ **$1.00**	Permits the vehicle to be parked ~~for a period of 60 minutes~~ **during the enforcement period of 8:00 a.m. to 5:00 p.m.**
Sec. 106-164	Violations; penalties		
	Subsec. (a)	Generally; Each violation if paid within 24 hours from time summons giving notice of violation is issued	A fine of not less than $1.00 for each violation
	Subsec. (a)	Generally; Each violation if paid after expiration of 24 hours from time summons giving notice of violation is issued	$2.00 for each violation, if payment is made voluntarily prior to the time and date set forth in the summons

	Subsec. ~~(b)~~**(a)**	Fourth Violation; Each violation if paid within one hour from time summons giving notice of violation is issued	$1.00 for each such violation
	Subsec. ~~(b)~~**(a)**	Fourth Violation; Each violation if paid after expiration of one hour from time summons giving notice of violation is issued	$2.00 for each violation, if payment is made voluntarily prior to the time and date set forth in the summons
	Subsec. ~~(b)~~**(a)**	Fifth violation, etc.; Any person committing more than four violations within any 30-day period of the provisions of this division	$5.00 for each such violation, if payment is made voluntarily prior to the time and date set forth in the summons.
	Subsec. ~~(d)~~**(b)**(4)	Any person who unlawfully removes a device for immobilization of a vehicle	$500.00 fine for each violation
	Subsec. ~~(d)~~**(b)(5)**	Any person who tows or otherwise moves an immobilized vehicle without authorization by the chief of police or his designee	$500.00 fine for each violation
	Subsec. ~~(c)~~**(c)**	Cost. No cost will be assessed if payment of the penalty as hereinbefore imposed is voluntarily paid without the necessity of a hearing before the proper official	

ADOPTED: *

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SYNOPSIS

The proposed amendments clarify which laws are to be enforced; stipulates that the police chief selects the deputy police chief; creates a police chief selection committee; removes the special police section; establishes the police cadet program; brings the disposal of personal property held by the police department into compliance with existing policies and procedures; updates traffic and vehicle fines and simplifies the language regarding violations and penalties and amends Appendix F - Fees and Fines to correspond with the language changes.

(SPONSORS: HARE AND HUTCHISON)

Actions History

05/11/2015 - Scheduled for Introduction at Legislative, Finance, and Administration Committee

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ACTION FORM

PROCEEDING: Legislative, Finance, & Administrative Committee
DEPARTMENT OF ORIGIN: Finance **DATE SUBMITTED**: 5-11-15
PREPARED BY: Donna Mitchell, Controller
SUBJECT: Budget Amendment – Transfer from Rate Stabilization Reserve to Electric Operating Fund
REFERENCE: N/A
RELATED PROJECT: N/A
APPROVALS: City Council
EXHIBITS: N/A
TIMETABLE: N/A
RECOMMENDED ACTION: Staff recommends an additional transfer of $1 million from the Rate Stabilization Reserve to the Electric Operating Fund in fiscal year 2015 to address cash flow requirements.

BACKGROUND AND ANALYSIS

The City's financial policy requires the City to maintain operating budget balances at a minimum of 8% up to 12% for cash flow requirements. These requirements are created by the City's service being rendered prior to billing the customer, so there is a month lag in revenue receipts for the services provided. The 8% equates to a little less than one month of budgeted expenses or to put it another way less than 30 days of cash requirements.

There has been some difficulty maintaining sufficient cash balances in the Electric Fund the past two years due to the significant fluctuations in the power supply cost and load during extreme cold or hot months. An example of this would be this past February. The cold weather increased our wholesale load by 8.4 million kilowatt hours over the budgeted load for the month. The budgeted wholesale power supply cost per megawatt hour was $75.19 for February 2015. The actual cost was $105.08 per megawatt hour due to PJM market pricing. In order to pay the weekly PJM invoices, we took temporary advances from other accounts.

Staff is recommending an additional transfer from the Rate Stabilization Reserve of $1 million over the $2 million originally budgeted in fiscal year 2015 to address the cash requirements. During the upcoming budget workshops we will be recommending a policy change to require a minimum budget balance of 12% or 45 days of cash requirements for the Electric Fund.

ACTION FORM

PROCEEDING: Legislative, Finance & Administrative Committee	**AGENDA: 05/11/15**
DEPARTMENT OF ORIGIN: Finance	**DATE SUBMITTED: 04/30/15**
PREPARED BY: Donna Mitchell, Controller/Treasurer	
SUBJECT: Investment Banking Custody Services – RFP#15-0019FN	
APPROVALS: City Council	
EXHIBITS: Exhibit 1 – REVISED Pricing Calculations & Comparisons	
EXPENDITURE REQUIRED: Est. $8,290 (fees will vary based on the number of security transactions) **AMOUNT BUDGETED**: N/A **FUNDING SOURCE**: Interest Earnings are reported net of fees	
TIMETABLE: Transfer of Assets from Union Bank to Custodian selected upon contract start date.	
RECOMMENDED ACTION: Staff recommends awarding the Investment Custody Services to Wilmington Trust for a three (3) year period to start the date of contract and may be renewed or extended for two (2) additional two (2) year periods by mutual consent and approval of City Council.	

RFP #15-0019FN was issued on November 24, 2014 for sealed proposals to be received January 29, 2015. Five proposals were received. The current proposal calls for a three (3) year period to start the date of contract and may be renewed or extended for two (2) additional two (2) year periods by mutual consent and approved by City Council.

As recommended by Committee on April 27, 2015, staff requested best and final pricing from each vendor. The results are as listed in the table below.

				Credit Ratings			Captalization	Estimated
Name of Bank	**Headquarters**	**Local Branch**	**Assets**	**Moody's**	**S&P's**	**Fitch**	**Rating**	**Fees**
Wells Fargo	Chicago	3 offices in Dover, DE	$1.687 Trillion	Aa3	AA-	AA-	Well	$ 13,979
Union Bank	New York City	None	$110.9 Billion	A2	A+	A	Well	$ 5,770
Key Bank	Cleveland, OH	None	$90 Billion	A3	A-	A-	Well	$ 10,000
M&T Bank (Parent Company)	Buffalo, NY	M & T offices in Dover	$97.1 Billion	A2	A	A-	Adequate	$ 8,040
Wilmington Trust - Proposal	Wilmington DE							
(Requesting Local Vendor Preference - Reduction of $250 on quote of $8,290)								
TD Wealth	Cherry Hill, N.J	2 offices in Dover, De	$20 Billion	Aa3	AA-	AA-	Well	$ 10,000

The best and final pricing resulted in changing staff's recommendation from Union Bank to Wilmington Trust.

Exhibit 1

Summary	
Trades	118
Coupons	134
Wires	20
Average Assets	50,000,000

Key Bank		
Bps Charge	0.020%	10,000.00
DTC Trades	3.00	354.00
Other Trades	7.00	0.00
Wire Transfers	7.00	140.00
Base Account Fee	0.00	0.00
Coupons	0.00	0.00
Hard Copy Statement	0.00	0.00
Annual Maximum	10,000.00	10,000.00
Expected Fees	**0.020%**	**10,000.00**

TD Bank		
Bps Charge	0.020%	10,000.00
DTC Trades	0.00	0.00
Other Trades	0.00	0.00
Wire Transfers	0.00	0.00
Base Account Fee	0.00	0.00
Coupons	0.00	0.00
Hard Copy Statement	0.00	0.00
Annual Minimum	3,000.00	3,000.00
Expected Fees	**0.020%**	**10,000.00**

Wilmington Trust		
Bps Charge	0.015%	7,500.00
DTC Trades	5.00	590.00
Other Trades	5.00	0.00
Wire Transfers	10.00	200.00
Base Account Fee	0.00	0.00
Coupons	0.00	0.00
Hard Copy Statement	0.00	0.00
Annual Minimum	3,000.00	3,000.00
Expected Fees	**0.017%**	**8,290.00**

Wells Fargo		
Bps Charge	0.025%	12,500.00
DTC Trades	8.00	944.00
Other Trades	0.00	0.00
Wire Transfers	10.00	200.00
Base Account Fee	0.00	0.00
Coupons	2.50	335.00
Hard Copy Statement	0.00	0.00
Annual Minimum	10,000.00	10,000.00
Expected Fees	**0.028%**	**13,979.00**

UnionBank		
Bps Charge	0.000%	0.00
DTC Trades	15.00	1,770.00
Other Trades	15.00	0.00
Wire Transfers	10.00	200.00
Base Account Fee	3,500.00	3,500.00
Coupons	0.00	0.00
Hard Copy Statement	25.00	300.00
Annual Minimum	0.00	0.00
Expected Fees	**0.012%**	**5,770.00**