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Bank Account Reconciliation, Bank Account Access and Automated Clearing House (ACH) Transactions Review

Published by Order of the Audit Committee
on
October 19, 2011

Report # 2011-07



Date: October 19, 2011

To: LeaAnn Stagg, Director of Treasury and Interim Controller

Re: Bank Account Reconciliation, Bank Account Access and Automated Clearing House (ACH) Transactions Review

The Internal Audit Department (IA) conducted a review of the City's Bank Account Reconciliations, Bank Account Access and Automated Clearing House (ACH) Transactions. This review was included in the 2011 Internal Audit Plan, and was completed in August 2011.

Background

The City of Minneapolis (City) Treasury Division, a branch of the Finance Department, is responsible for the management of the City's banking, investment, revenue collection and cash management.

The Treasury Division is committed to serve customers and the City with high standards, provide innovation and be adaptable to the changing needs of customers. At a high level, the Treasury Division manages 24 bank accounts for the City. In 2010, the Division processed payments amounting to approximately \$1.3 billion through ACH transactions and wire transfers. The Treasury Division also manages the City's investment portfolio valued at approximately \$533.5 million as of December 31, 2010.

Objectives

The review was performed to assess whether controls are adequate to ensure:

- Bank account access is properly managed;
- Electronic Funds Transfer (EFT) is properly managed including ACH;
- Bank accounts are reconciled and reviewed timely; and
- Duties are appropriately segregated in the above processes.

Scope

This review included gaining an understanding of internal controls, including current policies and procedures, through observation, inquiry, and limited testing surrounding the processes listed above. We performed, on a sample basis, testing of processes and transactions within the period January 1, 2011 through June 30, 2011.

Summary of Findings and Management Action Plans

1. Commercial Electronic Office (CEO) Transaction Limits and Authorization¹

All authorized users have high dollar wire transfer transaction limits which represents unnecessary risks to the City. IA recommends Finance management should reevaluate the authorized user limits for wire transfers based on the normal business needs and limit the number of authorized users for high dollar transactions to a limited number of senior management personnel.

Management Action Plan

Treasury management will explore lowering the individual transaction limits to better align with the historical frequency of high dollar transactions as well as look at limiting the number of authorized users for high dollar transactions. To maintain sufficient operational flexibility and efficiency, and within a framework of dual control and preventing errors, multiple users will need to have authorization for high dollar transactions.

2. Remote CEO Portal Login

Authorized employees have the ability to log into the CEO portal remotely from non-City computers. IA recommends Finance management develop guidelines or procedures that limit authorized employee access to City bank accounts from non-City computer(s) to emergency situations only.

Management Action Plan – No action is needed

Treasury/Finance management believes that fully utilizing the remote access and/or non-City computer transactional capabilities of the CEO portal and future banking products, given that there is a highly functioning security set-up with appropriate dual controls.

3. New Signer Background Checks

Currently, the City does not perform credit background checks on all new employees that will have the authority to sign for the City's bank accounts. IA recommends Finance management work jointly with Human Resources to put in place a process that allows for conducting credit background checks.

Management Action Plan

Finance management will consider adopting a policy of conducting credit checks, in addition to standard background checks, on personnel that have access to financial transactions.

4. Level of Authority of CEO Self Administrators

The Treasury Division's self administrators of the CEO portal have the ability to authorize individuals to sign on the City's bank account. Two self administrators may not have the proper level of responsibility within the City to grant such authority. IA recommends Treasury management assess and reassign the level of authority granted to self administrators within the CEO portal.

Management Action Plan – No action is needed

Treasury/Finance management believes that as self administration does not provide for any authority to execute transactions, and with a robust system of both dual control and segregation of duties, applying further restrictions through authorized limits to the self-administrative function is inappropriate and unwarranted, and would either compromise segregation of duties or require additional authorization of personnel to execute high dollar transactions.

¹ The Wells Fargo CEO portal is a web-based system the City uses in order to manage their Wells Fargo banking activities.

5. US Bank Authorized Signature

The City's US Bank authorized signatories included the City's previous CFO. IA acknowledges that Treasury management acted quickly to correct the oversight and promptly updated their written procedures to include this process.

Management Action Plan

This oversight was immediately corrected and written procedures exist to ensure timely notification to the bank when authorized signatories change.

6. Bank Reconciliation Testing

Of the five bank reconciliations tested, two of them had reconciling items that were more than one year old. To ensure accuracy of account balances, reconciling items should be resolved timely. IA recommends Finance management continue their efforts of resolving aged, un-reconciled items in bank reconciliations, ensuring all aged, un-reconciled items are properly resolved.

Management Action Plan

As part of the ongoing internal control testing and reconciliation work, unresolved reconciling items will be resolved.

7. Bank Account Reconciliation Quarterly Review

The 2011 second quarter bank account reconciliation review was limited to verification of accounting book balances, bank balances, and the verification of the existence of approval signatures, prepared dates, and review dates. IA recommends Finance management establish guidelines to include both qualitative and quantitative criteria when evaluating the bank account reconciliations.

Management Action Plan

The remaining reconciling items have been investigated to the point that we know they are not the result of fraud or errors and do not represent a cash problem nor are they related to the bank statements. They also do not represent a material misstatement of the financial condition of the City. As referenced in item #6 above, resolving open items is an ongoing process.

8. Policies and Procedures

Treasury management recently developed and updated department procedures; however, they do not appear detailed enough to appropriately guide staff in performing their necessary daily tasks. IA recommends Finance management continue their initiative of updating their written procedures for all Treasury key processes.

Management Action Plan

Treasury/Finance management does not believe it prudent to document detailed processes for these specific operations: accessing bank accounts, new user access changes or additions to individual authorization levels and ACH transactions, as we maintain stronger internal controls by limiting detailed procedures to those on a "need to know" basis and minimizing the effective "distribution" of that information. Procedures will be updated as necessary and reviewed at least annually.

Conclusion

Based on our review, we believe there are opportunities for improvements that address risk areas identified in this report. Finance and Treasury management worked collaboratively with Internal Audit to develop action plans. However, this report contains disagreements between IA and Finance management as some actions were not taken to address certain risk exposures to the City.

cc: Steven Bosacker, City Coordinator
Kevin Carpenter, CFO, Finance Department

Bank Account Reconciliation, Bank Account Access and Automated Clearing House (ACH) Transactions Review

Audit Findings and Management Action Plans

1. Commercial Electronic Office (CEO) Transaction Limits and Authorization

With regards to wire transfers, Treasury staff generated a report for IA from the Wells Fargo CEO portal which listed each authorized user's individual transaction limit, cumulative daily limit and transfer format type.² The report displayed all authorized users, who can either initiate or approve wire transfers, have high dollar authorizations that exceed the need for normal daily business. IA acknowledges that dual controls are setup on these transfers meaning one user must initiate the request and a different user must approve the request.

Setting high limits for all employees authorized to sign on the City's bank accounts represents unnecessary risks to the City. This large transaction limit is not necessary as part of the daily operations; the City makes payments this large only a few times a year. Employee transaction limits should reflect an amount that allows for daily transactions to occur. High limits should be given only to a small number of City employees with a high level of authority within the Finance department.

Recommendation

IA recommends Finance management reevaluate the authorized user limits for wire transfers based on the normal business needs. Finance management should limit the number of authorized users for high dollar transactions to a limited number of senior management personnel.

Management Action Plan

Treasury's authorized limits are consistent with our business needs related to debt service payments and we are comfortable with the limits and the staff authorizations related to those limits. Finance Management believes that the security measures in place in the CEO system, such as dual control and multi-layer identification, are more important safeguards against fraud and inappropriate transfers than additional limits on which personnel can execute particular wire transfers. Further restrictions may impair the ability of the Treasury to make critical City payments in a timely and efficient manner (e.g. debt service payments and the associated default risk.)

Furthermore, our wire limits are consistent with other large cities where Wells Fargo acts as a depository bank.

Treasury Management believes that well trained Treasury personnel that regularly use these banking products pose less of an operational risk than higher level management that may either not use the banking products on a regular basis, or not be available to approve wires as needed.

Notwithstanding these operational necessities, however, Finance management acknowledges that the existing limits are set at levels that exceed most of the individual wire transfer transactions. Accordingly, while maintaining the requirements for dual control, Treasury will examine lowering the existing limits to reduce risk on the high dollar transfers while maintaining operational efficiency and protections against errors and would expect some of the transactional limits to be reduced.

² The Wells Fargo CEO portal is a web-based system the City uses in order to manage their Wells Fargo banking activities.

The new CFO will continue his analysis of the Finance Department's roles and responsibilities including the Treasury Division. Further analysis will be put forth on assessing users' limits and the number of users able to move funds for the City as well.

Responsible Party

Kevin Carpenter, Chief Financial Officer
LeaAnn Stagg, Director of Treasury and Interim Controller

Expected Completion Date

December 31, 2011

2. Remote CEO Portal Login

Authorized employees have the ability to log into the CEO portal remotely from non-City computers and initiate or authorize wire transfers. Finance management does not have a policy in place that pertains directly to authorized employees logging in to the CEO portal remotely from non-City computers.

IA acknowledges there are dual authorization, password and fob controls in place.³ A single authorized user could not conduct a banking transaction alone; however, there are other risks associated with allowing remote CEO login. When logging into the CEO portal from a non-City computer, there is an increased risk of inadvertently sharing the City's bank account information through Spyware or other malicious threats.⁴ In the event the City's bank information is intercepted, City bank account information would potentially be exposed to fraudulent activities. Access to City bank accounts to authorize payments or initiate banking transactions should be performed only on highly secured City computers unless in the case of an emergency deemed appropriate by Finance management policy.

Recommendation

IA recommends Finance management develop written guidelines or procedures that limit authorized employee access to City bank accounts from non-City computer(s) to emergency situations only.

Management Action Plan – *No action is needed*

Treasury continually strives to keep current with the most recent innovations in banking technologies while maintaining vigilance on technological security. This includes the Wells Fargo's CEO Mobile Service which has state-of-the art and time-tested security features. This product has already been adopted by various corporate and public clients of Wells Fargo Bank.

Treasury is concerned that limiting the use of remote capabilities or non-City computers to emergency situations only may prevent the future adoption of valuable banking products such as Wells Fargo Mobile Service. These types of products enhance the ability of the City's Treasury to serve our citizens and vendors. Limiting our payment and receipting options to City computers except for emergency situations would appear to be short-sighted and unwarranted in an ever-changing landscape of technological innovation within the banking industry.

In this technological environment, and given the best-in-class security features of the CEO portal, Finance management believes specifically restricting this transactional tool to

³ A fob is a type of security token: a small hardware device with built-in authentication mechanisms.

⁴ Spyware is a type of dangerous software that can be implanted on computers and collects information about users without their knowledge.

emergency situations only is unwarranted and could expose the City to additional risk of operational errors. In addition, in conjunction with reduced transactional limits, maintaining appropriate operational flexibility is critical to enable timely payments.

Treasury will continue to research the benefits and risks of new and innovative banking products and implement products by appropriately ensuring that our system of internal controls and technological security is not compromised.

Responsible Party

Kevin Carpenter, Chief Financial Officer

Expected Completion Date

No action needed

3. New Signer Background Checks

Currently, the City does not perform credit background checks on all new employees that will have the authority to sign for the City's bank accounts. IA recognizes, however, that Finance management conducts comprehensive background checks (including criminal history) on potential job candidates before hiring employees at this level of authority. Running this additional credit background check on employees granted authority to sign for City bank accounts will protect the City from unnecessary risk exposure. Good business practices mandate performing such background checks, based on the business needs.

Recommendation

IA recommends Finance management work jointly with Human Resources (HR) to conduct credit background checks, in addition to the standard background check, before any City employee is authorized to sign for a City bank account. Furthermore, Finance should perform credit background checks for internal transferred employees as previous job responsibilities may not require authorizing and signing on City bank accounts.

Management Action Plan

Currently, there is no specific City policy related to conducting credit checks for either new hires or transfer employees for any set of positions with access to financial transactions within Treasury, the Finance Department or the City as a whole.

The Treasury Analyst position was ultimately filled by an internal candidate who transferred from a Senior Internal Auditor position in the City's Internal Audit Department. This Senior Internal Auditor was hired by Internal Audit within the past year so no additional background check was completed. This action is consistent with current City policy.

Finance management will consider adopting a policy of conducting credit checks, in addition to standard background checks, on personnel within the Treasury division and elsewhere within the Finance Department for positions that have access to financial transactions.

Responsible Party

Kevin Carpenter, Chief Financial Officer

Expected Completion Date

November 30, 2011

4. Level of Authority of CEO Self Administrators

The Treasury Division's self administrators of the Wells Fargo CEO portal have the ability to add new users to the portal and change a user's level of authorization, including authorizing individuals to sign on the City's bank account. During the fieldwork, there were three self administrators within the City and a fourth was expected to be added soon. In order to add a new user or change a current user's level of authorization within the CEO portal, two levels of approval by self administrators within the CEO portal are needed. Any two of the self administrators may provide this approval.

While IA acknowledges the controls in place require two self administrators to complete a new user addition or change in level of authorization, there is concern that one of the self administrators along with the expected fourth individual, based on their roles, may not have the proper level of responsibility within the City to grant authority to a City employee to sign on behalf of the City. Although these two self administrators may be requested to carry out their self administrator duties by an employee with higher authority, besides dual control, there is no other protective measure in place to prevent one or both of them from acting on their own, in error.

The self administrator role should be delegated to an employee with a high level of authority commensurate with their level of responsibilities within Finance / Treasury to mitigate unnecessary risks to the City.

Recommendation

IA recommends Treasury management assess and reassign the level of authority granted to self administrators within the CEO portal.

Management Action Plan – *No action is needed*

Treasury has established its CEO self administration within a framework of dual control and segregation of duties. Segregation of duties means that we have designated administrator staff within the Treasury Division that specifically do not have the ability to execute payments within CEO; this is completely consistent with the Association for Financial Professionals (AFP) recommended "best practices" regarding self administration of a banking portal.

Treasury management believes that applying further restrictions to the designation of individuals performing the self-administration function within the CEO system is unwarranted. Current practice requires senior level authorization for self-administrative functions to be executed, and this process is in accordance with recommendations of our banking partners.

Treasury management feels that it would not be prudent to select higher level Treasury staff to perform CEO self administration specifically because the higher level staffs have the ability to initiate or approve wire transfers and, especially with lower transactional limits, those personnel are needed to perform those duties. To implement the recommendation above would weaken Treasury's internal risk controls and/or operational flexibility since either the segregation of duties control would be compromised or additional personnel would need to be authorized to perform high dollar transactions.

Responsible Party

Kevin Carpenter, Chief Financial Officer

Expected Completion Date

No action needed

5. US Bank Authorized Signature

Prior to IA's request for a list of current personnel authorized to sign on behalf of the City on its US Bank accounts; the City's US Bank authorized signatories had not been updated since the departure of City's previous Chief Financial Officer (CFO) in January 2011. IA acknowledges that Treasury management acted quickly to correct the oversight by requesting US Bank to remove the previous CFO's signature and replace it with the current CFO. It is important to promptly update all authorized signatories as soon as a change of authority occurs to eliminate unnecessary risk exposure. IA acknowledges that Treasury management promptly updated their written procedures to include this process.

Recommendation

IA recommends Treasury management develop and put into effect a standard process to ensure whenever City personnel having authorized signatories change or leave his/her positions the bank signatories are immediately updated to include only valid authorized individuals. Also, IA recommends Treasury management periodically perform self reviews to ensure authorized signatures are limited to those with current responsibilities.

Management Action Plan

As noted above, this oversight was immediately corrected. Treasury will ensure in the future that changes in authorized personnel are promptly updated at the Bank.

Having said this, Treasury does not believe that the City of Minneapolis' assets were at an increased level of risk in this situation. There are, in fact, mitigating controls in place which enhance and compliment each other.

With the change in CFOs, Treasury staff immediately updated the authorized parties for the City's general bank account at Wells Fargo where the banking transactions take place. The accounts referred to in this finding are the custody accounts for the City's investment pool at US Bank. No checks can be issued from the investment account. Furthermore, money in this account can only move as follows:

1. Between the individual investment managers' accounts at US Bank, and/or,
2. Between the investment operating account at US Bank and the City's general operating bank account at Wells Fargo.

Additionally, the role of the City CFO is to designate specific Treasury staff to direct money movement to, from and within the US Bank custody accounts. The City CFO has no ability to initiate investment transactions to, from or within the investment accounts at US Bank.

Furthermore, existing Cash Management Procedures for the Treasury Division explicitly provide for notification to the bank when authorized signers leave the City or new signers are authorized. As noted above, this oversight was immediately corrected; on an ongoing basis Treasury management will make the appropriate changes to authorized signatories as personnel changes warrant.

Responsible Party

LeaAnn Stagg, Director of Treasury and Interim Controller

Expected Completion Date

Completed

6. Bank Reconciliation Testing

A few reconciling items included in two of the five bank reconciliations tested were found to be aged greater than one year, including one reconciling item amounting to \$1,046,838. IA acknowledges that Treasury management began improving the bank reconciliation process in 2010 and has properly shifted the responsibilities of performing and reviewing bank reconciliations to the Controller's office to ensure duties are properly segregated. In addition to this shift, Treasury has also made various other improvements to the process; however, when outstanding items are not reconciled timely, there is an increased risk of undetected errors, or fraud. To ensure accuracy of account balances, reconciling items should be resolved timely.

Recommendation

IA recommends Finance management continue their efforts of resolving aged, un-reconciled items in bank reconciliations, ensuring all aged, un-reconciled items are properly resolved.

Management Action Plan

We continue to investigate and resolve aged exceptions on the bank reconciliations. As of 12/31/2009 there were 1,507 exceptions, and at the time of this audit the number of exceptions was down to 263. All current exceptions are investigated and resolved in a timely manner. In fact, the external auditors removed their audit finding regarding the City's bank account reconciliations with the most current (i.e. 2010) audit and also found that the financial statements of the City were materially accurate and complete.

The remaining reconciling items have been investigated to the point that we know they are not the result of fraud or errors and do not represent a cash problem nor are they related to the bank statements. Rather, they represent normal and ongoing accounting entry adjustments related to non-cash assets or liabilities, which are cleared as additional information is uncovered and/or available.

Also, Finance management believes it is misleading to characterize one outstanding item as amounting to over \$1 million. That line item is likely an aggregation of a large number of open reconciling items, and again, does not suggest any issues with cash or bank reconciliations nor financial statement integrity.

As part of the Finance Department's ongoing process to test internal controls across a number of financial processes, open reconciling items will be identified and resolved.

Internal control testing is a continual process, with the most significant issues – from a cash and bank reconciliation and financial statement perspective – resolved first.

Responsible Party

LeaAnn Stagg, Director of Treasury and Interim Controller

Expected Completion Date

June 30, 2012 for aged reconciling items and ongoing for new items and internal control testing.

7. Bank Account Reconciliation Quarterly Review

As part of an initiative to improve internal controls, Finance management endorsed a quarterly review of key City accounts including bank accounts. IA acknowledges the magnitude of this initiative and supports management on their decision.

The 2011 second quarter bank account reconciliation review was completed with a good process in place; however, the review was limited to verification of accounting book balances, bank balances, and the verification of the existence of approval signatures, prepared dates, and review dates. The review did not include an assessment of the reasonableness and the age of the reconciling items. Overlooking the reasonableness and age of reconciling items (qualitative measures) will reduce the value of the quarterly key account review. The scope of the quarterly bank account reconciliation review should also include the evaluation of reconciling items for reasonableness and timeliness of resolution.

Recommendation

IA recommends Finance management establish guidelines to be followed in performing their quarterly review. The guidelines should be expanded to include both qualitative and quantitative criteria when evaluating the bank account reconciliations. IA also recommends providing appropriate training to the preparers and reviewers on such criteria.

Management Action Plan

The review mentioned above that included verifying book and bank balances and approval evidence was part of the Finance Department's quarterly testing of Internal Controls, not any part of the reconciliation process. The Finance Department performs and reviews every bank account every month. The established quarterly review of the reconciliations does in fact include an assessment of outstanding reconciling items, from both a qualitative and quantitative perspective.

With respect to training, detailed step-by-step procedures are included in every account reconciliation spreadsheet and are continuously updated with any changes to the general ledger accounts, processing or bank account. In April of 2011, in order to implement a better segregation of duties and improved risk controls for the City, the reconciliation processes were transferred from Treasury to the Controller's Division; ongoing training for managers in the Controller's division has been a key part of this transition of duties.

As mentioned in #6 above, in their most recent audit, the state auditors removed their findings regarding the City's bank account reconciliations. Also as noted in #6 above, the remaining reconciling items have been investigated to the point that we know they are not the result of fraud or errors and do not represent a cash problem nor are they related to the bank statements.

Responsible Party

LeaAnn Stagg, Director of Treasury and Interim Controller

Expected Completion Date

June 30, 2012 for aged reconciliations and ongoing for bank reconciliations, internal control testing and training.

8. Policies and Procedures

Policies and procedures related to various Treasury activities (e.g. bank account setup, access management, granting access to new user or changing/adding levels of authorization, ACH transactions, etc.) do not appear sufficiently comprehensive. Although IA recognizes that Treasury management recently developed and updated department procedures, they do not appear detailed enough to appropriately guide staff in performing their necessary daily tasks. Without well written procedures in place, Treasury personnel may not have clear, consistent guidance to meet management expectations as it pertains to their job functions.

Good business practices require updated, well written and detailed formal procedures. Written procedures are a valuable tool used to provide guidance to employees and communicate management expectations to employees. Without current written procedures, employees may perform processes inconsistently or incorrectly leading to an increased amount of unnecessary work correcting preventable errors. The procedures should be detailed enough to identify the required process, who will perform it, how it should be performed and when it should be performed.

Recommendation

IA recommends Finance management continue their initiative of updating their written procedures for all Treasury key processes including:

- Bank account setup and access;
- Bank account reconciliations;
- New user access, change or addition in authorization level; and
- EFT transactions including ACH transactions.

Additionally, IA suggests Finance management revisit and update as needed their procedures on an annual basis in order to ensure they accurately reflect current practices, processes and required controls.

Management Action Plan

As we have in the past, Treasury continually updates our procedures to reflect current Best Practices in the Banking Industry and as recommended as “best practice” by the Association for Finance Professional (AFP) and Government Finance Officer’s Association (GFOA). At a minimum, our procedures are updated on an annual basis.

Treasury management does not believe it prudent to document detailed processes for the following operations: accessing bank accounts, new user access changes or additions to individual authorization levels and ACH transactions, as formally documenting procedures for these particular operations potentially provides information to an unauthorized audience, increasing the risk of fraud or malfeasance. Treasury feels that we maintain stronger internal controls by limiting detailed procedures to those on a “need to know” basis and minimizing the effective “distribution” of that information.

More importantly, Treasury employs the current “best practices” to control risk currently available in the banking industry. Treasury’s documented policies and practices are consistent in substance and level of detail with those of the AFP. In addition, our treasury policies/practices are presented in more detail than those recommended by the GFOA.

The City’s document provides guidance regarding banking issues while allowing a sufficient degree of operational flexibility to take advantage of new and existing banking products. The City’s document includes guidance in the following areas: Treasury Authority, Bank Account Controls, Incoming/Outgoing Payment Procedures, Security, Daily Bank Statement Review,

Fraud Control, Check Disbursements and Receipts, and Electronic Fund Payments including ACH and Wire Transfers.

The control components related to fraud for a Treasury function include the use of positive pay, debit fraud filters, payment authorization and multi-layer identification for all online banking including ACH and wire transfers. The City also uses a dedicated and hardened workstation for all wire transfers. The dedicated workstation allows access only to the Wells Fargo secure website and prevents the possibility of malware intrusion. The City currently employs all of the critical fraud controls offered through the banking industry and has these documented in our procedures.

Detailed documentation of the Bank Reconciliation Process has been provided to Internal Audit by the General Accounting Group within the Controller’s Division of Finance.

Finance management will revisit and update procedures as needed, and review such procedures at least annually if not updated in the interim.

Responsible Party

Kevin Carpenter, Chief Financial Officer

Expected Completion Date

Procedures updated as needed, and reviewed at least annually – next annual review by December 31, 2012.

Abbreviations Used Throughout the Report	
ACH	Automated Clearing House
AFP	Association for Financial Professionals
CEO	Commercial Electronic Office, the portal used by Treasury management to monitor and manage Wells Fargo banking activities.
CFO	Chief Financial Officer
EFT	Electronic Funds Transfer
GFOA	Government Finance Officers Association
HR	The City of Minneapolis Human Resources Department
IA	Internal Audit
The City	The City of Minneapolis