



**TO:** Chief Business Officers

**FROM:** Marc A. LeForestier  
General Counsel

**RE:** Contractor and Grantee Compliance with Economic Sanctions Imposed in Response to Russia's Invasion of Ukraine

---

On March 4, 2022, Governor Gavin Newsom issued [Executive Order N-6-22](http://www.gov.ca.gov/wp-content/uploads/2022/03/3.4.22-Russia-Ukraine-Executive-Order.pdf) (EO) (available here: <http://www.gov.ca.gov/wp-content/uploads/2022/03/3.4.22-Russia-Ukraine-Executive-Order.pdf>) regarding sanctions in response to the Russian invasion of Ukraine.

The EO directs all agencies and departments that are subject to the Governor's authority to take certain immediate steps, including notifying all contractors and grantees of their obligations to comply with existing economic sanctions imposed by the U.S. government in response to Russia's actions in Ukraine, as well as any sanctions imposed under state law. As you know, many community college districts contract with the California Community Colleges Board of Governors, and this memorandum is shared with the listserv for this purpose.

This correspondence serves as a notice under the EO that as a contractor or grantee, compliance with the economic sanctions imposed in response to Russia's actions in Ukraine is required, including with respect to, but not limited to, the federal executive orders identified in the EO and the sanctions identified on the U.S. Department of the Treasury website (<https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/ukraine-russia-related-sanctions>). Failure to comply may result in the termination of contracts or grants, as applicable. If you have any questions regarding compliance with these sanctions, they should be addressed to your legal counsel.

Please note that for any agreements or grants valued at \$5 million or more, a separate notification will be sent outlining additional requirements specified under the EO.

###