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LEGAL UPDATE

May 23, 2022

To: Superintendents/Presidents/Chancellors, Member Community
College Districts

From: Loren W. Soukup ^{LS}
Senior Associate General Counsel

Subject: Update on Economic Sanctions Notification
Memo No. 10-2022(CC)

On May 12, 2022, our office issued Legal Update Memo No. 09-2022(CC) concerning the economic sanctions put into place by Governor Gavin Newsom’s Executive Order N-6-22. Since we issued the Legal Update, we have received clarifying information from the Department of General Services (“DGS”) regarding the application of the Executive Order to local educational agencies. According to DGS, local educational agencies were not intended to be included as an “agency or department subject to the Governor’s authority,” as set forth under the Executive Order. Therefore, local educational agencies are not mandated under the Executive Order to provide notice to all current contractors/vendors of their obligations to comply with the existing sanctions.

However, local educational agencies are still encouraged to review all investments and contracts to ensure compliance with the 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, and to take actions to support the Ukrainian government by refraining from new investments in, and financial transactions with, Russian institutions or companies that are headquartered or have their principal place of business in Russia.

Our office has updated our template contracts to include these new recommendations. Please contact us if you would like to receive any of the updated contracts. For more information regarding the economic sanction requirements, please visit <https://www.dgs.ca.gov/OLS/Ukraine-Russia>.

Please contact our office with questions regarding this Legal Update or any other legal matter.

The information in this Legal Update is provided as a summary of law and is not intended as legal advice. Application of the law may vary depending on the particular facts and circumstances at issue. We, therefore, recommend that you consult legal counsel to advise you on how the law applies to your specific situation.

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