

State Actions Targeting Russia

APRIL 27, 2022

Alabama	<p>On April 7, 2022, the Alabama Legislature passed HJR101, condemning Russia for its military invasion of Ukraine and offering its support to the people of Ukraine. The Resolution further encourages all Alabama residents to disfavor Russian products.</p>
Alaska	<p>On March 4, 2022, Governor Dunleavy issued a statement of several actions, including directing State agencies to identify Russian products or contracts for services with Russian companies and to divest those relationships.</p> <p>On April 4, 2022, the Alaska Legislature introduced HB 407, which aims to, in part: (1) block Russian imports, including fish, alcohol, and energy; (2) prevent Russian ships from accessing Alaskan ports; and (3) prevent Russian oligarchs from sheltering funds offshore in Alaskan accounts.</p>
Arizona	<p>On March 7, 2022, the Arizona Board of Regents instructed Arizona universities to divest any investments held in Russian assets. The Board also is prohibited from including Russian assets in the Board's own retirement plan.</p>
Arkansas	<p>On February 28, 2022, the Arkansas Legislature filed SR30, which aims to grant Arkansas Banks the authority to freeze the assets of Russian oligarchs.</p> <p>On March 1, 2022, the Arkansas Legislature adopted SR33 and HR1035, both of which condemn the actions of Russia.</p>
California	<p>On March 4, 2022, Governor Newsom issued Executive Order N-6-22, which directs all state agencies and departments to review contracts for commodities, services, and technology to determine whether they comply with existing economic sanctions, and, to the extent any contracts involve entities that are the target of economic sanctions, to terminate such agreements and refrain from entering into new ones. Contractors are to be in compliance with all relevant sanctions within 45 days of the EO, and those contracts in excess of \$5M not only must report on compliance with sanctions to the State, but also must “desist[] from making new investments in, or engaging in financial transaction with, Russian entities, not transfer[] technology to Russia or Russian entities, and directly provid[e] support to the government and people of Ukraine.”</p>
Colorado	<p>On February 24, 2022, Governor Polis issued Executive Order D 2022 011, which directs the Directors of the Office of Information Technology and the Department of Personnel and Administration to review State contracts and determine if any are with Russian state-owned companies directly, or as subcontractors. To the extent any are identified, the Directors are to terminate such contracts and ensure future procurements analyze possible connections with Russia.</p>
Florida	<p>On March 1, 2022, the Florida Senate adopted a resolution condemning Russia.</p> <p>In HB 5003, a Bill implementing the 2022-2023 General Appropriations Act, the Florida Legislature has included language prohibiting “a state agency, political subdivision, public school, state college, or state university” from “enter[ing] into any agreement with or accept[ing] any grant from the Russian Federation” until July 1, 2023. In order to facilitate this ban, the Department of Management Services is instructed to review all state agency contracts and procurements to determine “whether state funds are being spent on goods and services from Russian-based companies.”</p> <p>In a law passed in 2021, Florida already prohibited “a state agency, political subdivision, public school, state college, or state university” from contracting with “a foreign country of concern,” which includes the Russian Federation.</p>
Georgia	<p>On March 28, 2022, the Georgia Legislature passed SB562, which prohibits “scrutinized companies” – those owned or operated by the government of Russia or Belarus – from bidding on state contracts. All companies bidding on a state contract also will need to certify that they are not a “scrutinized company.”</p>

Hawaii	On March 4, 2022, the Hawaii Legislature enacted HR28 , which condemned the Russian Government for its attack on Ukraine, and “urged” state agencies to “cease any business or government contracts with the Russian Government or Belarussian Government, or contractors of either government.”
Idaho	<p>On March 22, 2022, the Idaho Legislature enacted House Concurrent Resolution 41, which directed the Idaho Endowment Fund Investment Board to divest itself of any assets of Russian currency.</p> <p>On March 3, 2022, the Idaho Legislature enacted HB 728, which calls on the Public Employee Retirement System of Idaho (PERSI), to divest Russian currency investments in Russian government assets.</p>
Illinois	As of April 5, 2022, the Illinois Legislature has been considering HB 1293 , which condemns Russia, urging investment funds to divest their holdings in Russia or Belarus, and prohibiting public agencies from investing public funds in Russia or Belarus.
Indiana	<p>On February 28, 2022, Governor Holcomb enacted Executive Order 22-08, which directed, in part, that: (1) the Indiana Office of Technology “take any and all steps to further strengthen and harden our critical state infrastructure from possible Russian cyber-attacks; and (2) the Indiana Department of Administration review all contracts across state government to determine whether, and to what extent, Hoosier tax dollars are being spent on goods and services from Russian-owned or Russian-affiliated companies.</p> <p>On March 18, 2022, the Indiana Legislature enacted SB 388, which requires institutions owned or controlled by a foreign source to disclose gift and contract information when it involves Russia, and prohibits certain foreign business entities from holding and conveying agricultural land.</p>
Iowa	On February 28, 2022, Governor Reynolds directed the Iowa Alcoholic Beverages Division to remove any Russian-produced alcoholic liquor products from its wholesale purchase list.
Louisiana	On March 3, 2022, the Louisiana Legislature introduced SB 196 , which would ban the importation of any product from Russia, including oil and gas, iron and steel, precious metals, and agricultural products, and will remain in place until the federal sanctions are lifted.
Maine	On February 28, 2022, Governor Mills signed a Proclamation declaring solidarity with Ukraine and called upon the State’s Liquor and Lottery Commission to delist all Russian-made spirits.
Massachusetts	On March 3, 2022, Governor Baker issued Executive Order No. 597 , which directs the Secretary of the Executive Office for Administration and Finance to take several actions to “verify that no executive department agency” is currently contracting with, or partnered, affiliated, or in an exchange with “any Russian state-owned company, Russian government controlled entity, or Russian governmental body.” Such identified contracts must be terminated to the extent permitted by law.
Michigan	On March 9, 2022, the State of Michigan Investment Board determined to divest the State of Michigan Retirement Systems pension plans from companies based in Russia and Belarus.
Minnesota	<p>On March 4, 2022, Governor Walz issued Executive Order 22-03, which condemned Russia and requires State agencies to terminate existing contracts with Russian entities and refrain from entering into future contracts with Russian entities.</p> <p>On April 1, 2022, the Minnesota Legislature enacted HF 4165, which divests Minnesota’s state pensions of Russian and Belarussian assets, and codifies Governor Walz’s EO barring Minnesota from contracting with Russian companies.</p>
Mississippi	On March 25, 2022, the Mississippi Legislature enrolled Senate Concurrent Resolution 563 , which condemns the Russian invasion, and directs that Mississippi will “sever all economic, financial, and other connections, and refrain from engaging in future economic, financial, and other connections” with Russia, including by prohibiting “the sale, purchase, distribution, or storage of alcoholic beverages from Russia,” “the investment in Russian businesses through the Mississippi Development Authority or other publicly financed economic development projects,” and “the use of Russian vendors for any services or goods for public entities, including state agencies, counties, and municipalities.”

Missouri	As of April 13, 2022, the Missouri Legislature has been considering HB 2913 , which applies to a private or public entity in the state of Missouri that receives public funding, and limits contracts with any country currently attacking a NATO ally, Ukraine, Georgia, Finland, or Sweden.
Montana	On March 2, 2022, Governor Gianforte issued a memorandum to all State Agency Directors, requesting all agencies “conduct a swift, thorough review of assets and operations that may benefit the Russian government.”
Nebraska	On March 4, 2022, Governor Ricketts issued a statement condemning Russia and announcing that the State had undergone a review of all State contracts, determining the State had not done any business in Russia.
New Hampshire	On February 26, 2022, Governor Sununu issued Executive Order 2022-2 , which ordered that all Russian-made and Russian-branded spirits be removed from shelves in all New Hampshire Liquor and Wine Outlets.
New Jersey	<p>On March 2, 2022, Governor Murphy issued Executive Order No. 291, which directed State agencies to “review their authority to suspend or revoke licenses, permits, registrations, and certifications of companies owned or controlled by the government of Russia [or] Belarus,” to “review the State’s ability to boycott or halt the import or purchase of any products or services,” including liquor, and to “review relevant State contracts to determine if any are with companies owned or controlled by the government of Russia [or] Belarus.”</p> <p>On March 9, 2022, the New Jersey Legislature enacted S1889, which provides, in part: (1) the Department of Treasury must develop a list of persons it determines engage in prohibited activities in Russia or Belarus; (2) persons identified in such a list are prohibited from entering into or renewing contracts with State agencies for the provision of goods or services; and (3) contractors are required to certify, before contract is awarded, renewed, amended, or extended, regarding prohibited activities in Russia and Belarus.</p>
New Mexico	On March 4, 2022, Governor Grisham issued a statement urging the State Investment Council to immediately evaluate state portfolios and divest state resources from the Russian government.
New York	<p>On February 27, 2022, Governor Hochul issued Executive Order No. 14, which ordered State agencies to divest public funds from supporting Russia.</p> <p>On March 17, 2022, Governor Hochul issued Executive Order No. 16, which prohibits State entities from entering into any new contracts or renewing any existing contracts with an entity conducting business operations in Russia, absent a written determination by the head of an Agency.</p>
North Carolina	On February 28, 2022, Governor Cooper issued Executive Order No. 251 , which directed State entities to “review all existing contracts and operations to determine whether they directly benefit any Russian Entities,” and, to the extent any are identified, to take reasonable steps to terminate such contracts. This includes a review by the North Carolina Department of Administration, Division of Purchase & Contract of all existing State contracts for goods and services. Future contracts with Russian Entities – corporations, companies, or other entities headquartered in Russia, or with a principal place of business in Russia, including any wholly-owned or majority owned subsidiaries – also are banned.
Ohio	<p>On February 26, 2022, Governor DeWine directed the Ohio Department of Commerce to cease the purchase and sale of Russian-origin vodka.</p> <p>On March 3, 2022, Governor DeWine issued Executive Order 2022-22D, which directed that all “State agencies, boards and commissions, state educational institutions, and pension funds,” (1) divest their money in Russian assets, and (2) “terminate any contracts with a Russian institution or company and to refrain from entering into any new contracts with such institutions or companies in the future.” Agency procurement officers are further directed to create standard contract language that reflects this order and require contractors to (a) affirm they understand the requirements of the EO, and (b) disclose the principal location of business for the contractor and all subcontractors supplying goods and services to the State.</p>
Oklahoma	On February 28, 2022, the Oklahoma Legislature adopted SR 27 , which condemned Russia.
Oregon	On February 28, 2022, the Oregon Liquor & Cannabis Commission directed the operators of Oregon’s independently owned liquor stores to stop selling all Russian manufactured distilled spirits.

<p>South Carolina</p>	<p>On March 1, 2022, the South Carolina Legislature introduced H 5054 and S 1111, which would prohibit the Retirement Investment Commission from investing public employee retirement funds in companies owned by Russia.</p> <p>On March 1, 2022, the South Carolina House introduced H 5055, which would prohibit retail dealers from selling liquor that was manufactured or produced in Russia.</p>
<p>Texas</p>	<p>On February 26, 2022, Governor Abbott asked Members of the Texas Restaurant Association, Texas Package Stores Association, and all Texas retailers to voluntarily remove Russian products from their shelves.</p> <p>On March 2, 2022, Comptroller Glenn issued a statement instructing his staff to “review every state contract and procurement in our Statewide Procurement Division and every payment made through the Texas Treasury for ties to Russian-owned businesses.”</p> <p>The Texas Legislature already had passed a law last year that blocked businesses and government entities from contracting with companies from China, Russia, North Korea, and Iran as a preventative measure to protect critical infrastructure.</p>
<p>Utah</p>	<p>On February 26, 2022, Governor Cox issued Executive Order 2022-03, requiring all Russian-produced and Russian-branded products be removed from the shelves of all Utah State Liquor Stores, and directed that the “Governor’s Office of Economic Opportunity shall review the state’s procurements.”</p>
<p>Vermont</p>	<p>On March 3, 2022, Governor Scott issued Executive Order 02-22, directing that all Russian-sourced alcohol be removed from store shelves, and directing “the Secretary of the Agency of Administration and the Commissioner of the Department of Buildings and General Services (BGS)” and the “Secretaries and Commissioners of the Executive Branch” “to review all contracts for the purchase of goods and immediately cease purchases and terminate contracts for the purchase of Russian-sourced goods and goods produced by Russian entities.”</p>
<p>Virginia</p>	<p>On February 26, 2022, Governor Youngkin issued a statement that, <i>inter alia</i>, ordered the “Department of General Services to immediately review all contracts across government and procurement to determine what, if any, Virginia tax dollars are spent on goods and services from primarily Russian companies.”</p>
<p>Washington</p>	<p>On March 4, 2022, Governor Inslee issued Executive Order 22-03, which announced the Governor’s plan to “conduct a review to identify any commercial or other contracts, investments, and relationships between my executive branch agencies and Russian state institutions or companies” with the goal of identifying and “ultimately sever[ing] these relationships.”</p>
<p>West Virginia</p>	<p>On February 28, 2022, Governor Justice Signed Executive Order No. 2-22, which directs the State to cease all sales of Russian-made liquor brands.</p>

In providing this table, we do not weigh in on the legality of any action capture herein, especially where the Federal government typically is tasked with primary authority over diplomatic relations and sanctions. Nor do we proclaim this table offers a comprehensive summary of every relevant State action—we not only expect additional resolutions in the days and weeks to come, but also expect that many actions may be amended as they make their way through State legislatures. In providing this summary, we only aim to assist contractors in identifying new and evolving restrictions and requirements impacting contractor performance in those named States.