



# COMMONWEALTH of VIRGINIA

Office of the Attorney General

Kenneth T. Cuccinelli, II  
Attorney General

900 East Main Street  
Richmond, Virginia 23219  
804-786-2071  
FAX 804-786-1991  
Virginia Relay Services  
800-828-1120  
7-1-1

## MEMORANDUM

**To:** J. Everette Fauber, III, Chair  
APELSCIDLA Board  
Department of Professional and Occupational Regulation

Kate Nosbisch, Executive Director  
APELSCIDLA Board  
Department of Professional and Occupational Regulation

**From:** Steven P. Jack  
Assistant Attorney General

**Date:** April 29, 2011

**Subject:** Letter of Assurance for Amendments to Board Regulations 18 VAC 10-20 et seq.

---

I have reviewed the APELSCIDLA Board's proposed amendments to its regulations, particularly 18 VAC 10-20 *et seq.*, that were posted on the Virginia Regulatory Town Hall internet site on April 29, 2011. In my view, as counsel to the APELSCIDLA Board, these regulations may be promulgated pursuant to §§ 54.1-201(5), 54.1-404, and 54.1-411(C) of the *Code of Virginia*. The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect.

This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.