



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**TO:** Garth L. Wheeler, Director  
Department of Criminal Justice Services

**FROM:** Shannon Y. Dion  
Assistant Attorney General

**DATE:** September 9, 2013

**SUBJECT:** Repeal of Outdated Regulations Relating to Private Security Services Business Personnel (6 VAC 20-110)

In response to a request from the Department of Criminal Justice Services, I have reviewed the proposed repeal of regulations, 6 VAC 20-110, relating to private security services business personnel. Section 9.1-141 of the *Code of Virginia* gives the Criminal Justice Services Board the authority to promulgate regulations it deems necessary and appropriate for training and licensing standards for private security services. Additionally, certain sections of the Virginia Code have been repealed which were the basis for the existence of 6 VAC 20-110. As such, after reviewing the aforesaid repeal language, I find the proposed repeal to be constitutional, consistent with the statutory authority granted by § 9.1-141 and § 2.2-4012.1 of the *Code of Virginia*, and in conformity with existing statutory provisions.

*Please note that this memorandum is intended to provide legal interpretations and legal advice, not policy advice. To the extent that this communication may advise you that certain action is lawful, the decision whether to take such action remains a policy decision within the discretion of your agency and this communication should not be construed as a comment for or against the merits of such action.*