



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: Trisha Henshaw
Executive Director
Common Interest Community Board

From: Joshua E. Laws
Assistant Attorney General

Date: October 8, 2015

Subject: Letter of Assurance for Proposed Regulations – Time-Share Regulations – General Review and Registration of Time-Share Resellers found at 18 VAC 48-45

I have reviewed the Common Interest Community Board's Time-Share Regulations – General Review and Registration of Time-Share Resellers found at 18 VAC 48-45 that was posted on the Virginia Regulatory Town Hall on October 2, 2015. In my view, as counsel to the Common Interest Community Board, these regulations may be promulgated pursuant to Titles 54.1 and 55 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.