



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: Jay W. DeBoer
Director, Virginia Department of Professional and Occupational Regulation

From: Joshua E. Laws
Assistant Attorney General

Date: December 5, 2017

Subject: Letter of Assurance for Amended Regulations – Amendment to Prohibition on using the work of another without written consent found at 18VAC145-30-140

I have reviewed the Department of Professional and Occupational Regulation’s proposed Amendment to Prohibition on using the work of another without written consent found at 18VAC145-30-140 that was posted on the Virginia Regulatory Town Hall on November 20, 2017. In my view, as counsel to the Department of Professional and Occupational Regulation, these regulations may be promulgated pursuant to Title 54.1 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. The regulations also appear to qualify for the fast-track rulemaking process under § 2.2-4012.1 of the Code of Virginia because they are noncontroversial.

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.