



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**TO:** Dr. David Brown  
Director  
Virginia Department of Health Professions

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** July 12, 2021

**SUBJECT:** *Regulations Governing Pharmaceutical Processors*  
18VAC110-60

I have reviewed the proposed *Regulations Governing Pharmaceutical Processors*, 18VAC110-60, which were adopted by the Board of Pharmacy on July 6, 2021. The Board has the authority to adopt these regulations, and the regulations are exempt, under 2021 Va. Acts ch. 205 (Special Session I) and 2021 Va. Acts ch. 227 (Special Session I). The proposed regulations are constitutional and do not conflict with state laws or regulations.