



**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:** March 25, 2022

**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 March 15, 2022. The Board has the authority to adopt these regulations and the regulations are exempt under Virginia Code § 54.1-3442.6(N). The proposed regulations are constitutional and do not conflict with state laws or regulations.