



# **COMMONWEALTH of VIRGINIA**

*Office of the Attorney General*

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## **MEMORANDUM**

**To:** Laura Hare  
Policy Analyst  
Virginia Department of Agriculture and Consumer Services

Sandra J. Adams  
Commissioner  
Virginia Department of Agriculture and Consumer Services

**From:** Justin I. Bell  
Assistant Attorney General

**Date:** June 1, 2016

**Subject:** Letter of Assurance for Amendments to Regulations Governing Licensing of Pesticide Businesses Operating under Authority of the Virginia Pesticide Control Act, 2 VAC 5-680.

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I have reviewed the Board for Agriculture and Consumer Services's ("the Board") proposed amendments to Regulations Governing Licensing of Pesticide Businesses Operating under Authority of the Virginia Pesticide Control Act, 2 VAC 5-680. In my view, as counsel to the Department of Agriculture and Consumer Services, the Board may amend these regulations pursuant to Title 3.2 of the *Code of Virginia*. Amending these regulations does not appear, on its face, to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with 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.