



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**To:** Wade A. Jewell  
Executive Director  
Virginia Board of Accountancy

**From:** Robert N. Drewry  
Assistant Attorney General

**Date:** October 18, 2017

**Subject:** Letter of Assurance for Amended Regulations – Amendment to Board of Accountancy Regulations [18 VAC 5-22-90]

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I have reviewed the Board of Accountancy's proposed fast-track regulation found at 18 VAC 5-22-90 that was posted on the Virginia Regulatory Town Hall on October 4, 2017. In my view, as counsel to the Board of Accountancy, these regulations may be promulgated pursuant to Title 54.1 and 2.2 of the *Code of Virginia*.

The regulations do not appear to conflict with the Constitution of the United States of America 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.