



COMMONWEALTH of VIRGINIA

Office of the Attorney General

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MEMORANDUM

To: Elizabeth O. Rafferty
Policy and Legislative Director
Department of Housing and Community Development

From: Justin I. Bell
Assistant Attorney General

Date: October 20, 2017

Subject: Letter of Assurance for Updating Virginia Industrialized Building Safety Regulations, 13 VAC 5 – 91.

I have reviewed the Department of Housing and Community Development's update to the Virginia Industrialized Building Safety Regulations. In my view, as counsel to the Board of Housing and Community Development, these regulations may be promulgated pursuant to §§ 36-73 and 2.2-4000 et seq. 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.

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.