



# **COMMONWEALTH of VIRGINIA**

*Office of the Attorney General  
Richmond 23219*

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## **MEMORANDUM**

**To:** Bruce R. Cherry, President  
Board for Branch Pilots  
  
Kathleen R. Nosbisch, Executive Director  
Board for Branch Pilots

**From:** Cynthia H. Norwood  
Senior Assistant Attorney General

**Date:** August 11, 2010

**Subject:** Letter of Assurance for Proposed Emergency Regulation Relating to Temporary Licenses for Branch Pilots, 18VAC45-20-15. Temporary Licensure

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I have reviewed the proposed emergency regulation 18VAC45-20-15 relating to temporary licensure for Branch Pilots that was posted on the Virginia Regulatory Town Hall internet site on August 5, 2010. In my view, as counsel to the Board for Branch Pilots, the Board may propose such a regulation pursuant to § 54.1-902 of the *Code of Virginia*. The proposed regulation does not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor does it 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 regulation.