



COMMONWEALTH of VIRGINIA
Office of the Attorney General

Jay Jones
Attorney General

202 North 9th Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120

MEMORANDUM

To: Kevin Hall, Executive Director
Virginia Lottery

From: Amy Dilworth
General Counsel, Virginia Lottery
Sr. Asst. AG, Office of the Virginia Attorney General

Date: June 22, 2026

Re: Regulatory amendment to 11 VAC 5-41 (Disclosure of identity of winners) pursuant to legislative mandate (Action 7033 / Stage 11207)

I am in receipt of the above-referenced amendment to regulation 11 VAC 5-41, which brings the language in line with the legislative mandate to remove the \$1 million threshold for releasing the identity of winners without prior written consent. You have asked the Office of the Attorney General to review and confirm the Virginia Lottery Board has the legal authority to amend these regulations and the amendments comport with applicable state law.

It is my opinion that the Virginia Lottery Board, pursuant to Virginia Code § 58.1-4007A, has the authority to amend these regulations, and has not exceeded that authority. The amendment comports with Chapter 520 of the Virginia Acts of Assembly (2026 Regular Session) amending and reenacting Virginia Code §§ 2.2-3705.7 and 58.1-4029. This action is exempt from the provisions of Article 2 of the Administrative Process Act pursuant to Virginia Code § 2.2-4006A.4.a.

Should you have any questions, please feel free to contact me at (804) 692-7902.