



**COMMONWEALTH of VIRGINIA**  
*Office of the Attorney General*  
Richmond 23219

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Attorney General

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November 20, 2006

Elizabeth Scott Russell  
Executive Director  
Virginia Board of Pharmacy  
6603 West Broad Street  
Richmond, VA 23230-1712

**RE: Regulations Governing Wholesale Distributors, Manufacturers and Warehousemen  
18VAC110-50-10 et seq.**

Dear Ms. Russell:

I have reviewed the Proposed Regulation, 18 VAC 110-50-10 et seq., Regulations Governing Wholesale Distributors, Manufacturers and Warehousemen in accordance with the Administrative Process Act. The amended regulations to establish certain requirements for a pedigree system are constitutional and in conformity with statutory provisions.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Casway".

Howard M. Casway  
Assistant Attorney General

c: Elaine J. Yeatts, Agency Regulatory Coordinator  
Department of Health Professions