



# **COMMONWEALTH of VIRGINIA**

*Office of the Attorney General*

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## **MEMORANDUM**

**To:** Kathleen Nosbisch, Executive Director  
Auctioneers Board  
Department of Professional and Occupational Regulation  
9960 Mayland Drive, Suite 400  
Richmond, VA 23233

**From:** Elizabeth B. Peay  
Senior Assistant Attorney General

**Date:** September 21, 2021

**Subject:** Letter of Assurance 18 VAC 25-21

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I have reviewed the Auctioneers Board's amendments to their Regulations. In my view, as counsel to the Auctioneers Board, the Board may promulgate these regulations pursuant to §54.1-113 of the Code of Virginia. This amendment is further appropriate for exempt action pursuant to §2.2-4006(A)(4)(a). 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.

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