



# **COMMONWEALTH of VIRGINIA**

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## **MEMORANDUM**

**To:** Trisha Henshaw  
Executive Director  
Common Interest Community Board

**From:** Joshua E. Laws  
Assistant Attorney General

**Date:** December 23, 2015

**Subject:** Letter of Assurance for Proposed Regulations – Common Interest Community Management Information Fund Regulations – Continuation of Association Renewal Fee Reduction found at 18 VAC 48-60-60

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I have reviewed the Common Interest Community Board’s Common Interest Community Management Information Fund Regulations – Continuation of Association Renewal Fee Reduction found at 18 VAC 48-60-60 that was posted on the Virginia Regulatory Town Hall on December 15, 2015. In my view, as counsel to the Common Interest Community Board, these regulations may be promulgated pursuant to Title 54.1 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. Further, I certify that the proposed changes are exempt from the Administrative Process Act under Code of Virginia §§ 2.2-4006(A)(6) as the changes are “regulations of the regulatory boards served by...

(ii) the Department of Professional and Occupational Regulation or the Department of Health Professions pursuant to Title 54.1 [and] that are limited to reducing fees charged to regulants and applicants.”

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.