



# COMMONWEALTH of VIRGINIA

Office of the Attorney General

Mark R. Herring  
Attorney General

202 North Ninth Street  
Richmond, Virginia 23219  
804-786-2071  
804-371-8946 TDD

## MEMORANDUM

To: Kevin Hall  
Executive Director  
Virginia Lottery

From: Amy Dilworth  
Senior Assistant Attorney General  
and General Counsel to the Virginia Lottery

Date: September 21, 2020

Subject: Attorney General Certification for new Sports Betting Regulations  
11 VAC 5-60  
11 VAC 5-70  
11 VAC 5-80

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I have reviewed the referenced, APA-exempt regulations to implement a sports betting regulatory program in the Commonwealth of Virginia. These regulations are being promulgated pursuant to enactment 2 of the legislation codified as §§ 58.1-4015.1 and 58.1-4030 *et seq.* of the *Code of Virginia* and are exempt from the provisions of the Virginia Administrative Process Act. 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.