



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**TO:** Dr. David Brown  
Director  
Virginia Department of Health Professions

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** May 11, 2017

**SUBJECT:** *Regulations Governing Pharmaceutical Processors*  
18VAC110-60

I have reviewed the proposed *Regulations Governing Pharmaceutical Processors*, 18VAC110-60, which were adopted by the Board of Pharmacy on September 7, 2016. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400, 54.1-3307, 54.1-3316, 54.1-3320, 54.1-3321, 54.1-3408.3, 54.1-3434.01, 54.1-3442.5, 54.1-3442.6 and 54.1-3442.7. The proposed regulations are constitutional and do not conflict with state laws or regulations.