



COMMONWEALTH of VIRGINIA
Office of the Attorney General

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May 8, 2026

By Electronic Mail
Virginia Regulatory Town Hall

Re: 6 VAC 20-174 Regulations Relating to Private Security Services
Registered Personnel

Dear All:

I have reviewed the Department of Criminal Justice Services' proposed regulatory action for the regulation identified above. In my view, as counsel to the Department, I concur that the Department has legal authority to promulgate this regulation pursuant to § 9.1-102(66) of the Code of Virginia. Additionally, the Department has the authority to promulgate this regulation as an emergency regulation pursuant to § 2.2-4011 of the Code of Virginia due to passage of Chapter 367 of the 2024 Acts of Assembly (2024, House Bill 203) codifying the requirement to take such action.

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 approval 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 action.

Sincerely,

/s/ Cathie F. Hutchins
Senior Assistant Attorney General/Section Chief