



# **COMMONWEALTH of VIRGINIA**

*Office of the Attorney General*

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## **MEMORANDUM**

**To:** Jeff Brown  
Director of State Building Codes Office  
Department of Housing and Community Development

**From:** Justin I. Bell  
Assistant Attorney General

**Date:** February 5, 2021

**Subject:** Letter of Assurance for the Updating and clarifying the Virginia Manufactured Housing Licensing and Transaction Recovery Fund Regulations, 13 VAC 6 – 20.

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I have reviewed the Department of Housing and Community Development's update to the Virginia Manufactured Housing Licensing and Transaction Recovery Fund Regulations. In my view, as counsel to the Virginia Manufactured Housing Board, these regulations may be promulgated pursuant to §§ 36-85.18 and 36-85.36 et seq. of the *Code of Virginia*. The regulations also appear to qualify for the fast-track rulemaking process under § 2.2-4012.1 of the *Code of Virginia* because they are noncontroversial. Additionally, 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.