



COMMONWEALTH of VIRGINIA

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To: Kathleen Nosbisch, Executive Director
Board for Branch Pilots
Department of Professional and Occupational Regulation
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From: Elizabeth B. Peay
Senior Assistant Attorney General

Date: September 21, 2021

Subject: Letter of Assurance for 18 VAC 45-20

I have reviewed the Board for Branch Pilots amendments to the Board for Branch Pilots Regulations. In my view, as counsel to the Board for Branch Pilots, the Board may promulgate these regulations pursuant to §54.1-113 of the Code of Virginia. This amendment is further appropriate for exempt action pursuant to §2.2-4006(A)(4)(a). 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.
