



# **COMMONWEALTH of VIRGINIA**

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**To:** Ms. Christine Martine, Executive Director  
Cemetery Board  
Virginia Department of Professional and Occupational Regulation  
9960 Mayland Drive, Suite 400  
Richmond, Virginia 23233

**From:** Elizabeth B. Peay  
Assistant Attorney General

**Date:** February 24, 2020

**Subject:** Letter of Assurance for 18 VAC 47-20  
Amendments to the Cemetery Board's Regulations

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I have reviewed the Cemetery Board's amendments to the Cemetery Board's Regulations. In my view, as counsel to the Cemetery Board, the Board may promulgate these regulations pursuant to §54.1-113 of the Code of Virginia. The action is further exempt from the Administrative Process Act in accordance with Va. Code §2.2-4006(A)(6). 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.

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