



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: Stephen W. Calhoun
Regulatory Coordinator
Department of Housing and Community Development

From: Eric A. Gregory
Assistant Attorney General

Date: May 22, 2006

Subject: Letter of Assurance for Amendment to Uniform Statewide Building Code re: Transfer of Ownership

I have reviewed the proposed amendment to the Uniform Statewide Building Code regulations (13 VAC 5-63) that was submitted to the Virginia Regulatory Town Hall internet site on May 17, 2006. In my view, as counsel to the Department of Housing and Community Development and the Board of Housing and Community Development, the proposed amendment may be promulgated pursuant to §§ 36-137(5), 2.2-4002, and 2.2-4006(A)(4)(a) of the *Code of Virginia*. This memorandum does not address conformance or non-conformance with the procedural requirements imposed by § 2.2-4007 of the *Code of Virginia*. The proposed amendment does 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.

