



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**TO:** Dr. David Brown  
Director  
Virginia Department of Health Professions

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** October 4, 2018

**SUBJECT:** *Regulations Governing Wholesale Distributors, Manufacturers, and  
Warehouses*  
18 VAC 110-50

I have reviewed the proposed amendments to the *Regulations Governing Wholesale Distributors, Manufacturers, and Warehouses*, 18 VAC 110-50, which were adopted by the Board of Pharmacy on June 21, 2018. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400, 54.1-3435.4:01, and 54.1-3435.4:2. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.