



# **COMMONWEALTH of VIRGINIA**

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## **MEMORANDUM**

**To:** Trisha Henshaw  
Executive Director  
Common Interest Community Board

**From:** Joshua E. Laws  
Assistant Attorney General

**Date:** March 21, 2019

**Subject:** Letter of Assurance for Technical Corrections – Proposed Corrections to Time-Share regulations found at 18 VAC 48-30

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I have reviewed the Common Interest Community Board’s Proposed Corrections to Time-Share regulations found at 18 VAC 48-30 that were posted on the Virginia Regulatory Town Hall on March 21, 2019. In my view, as counsel to the Common Interest Community Board, these regulations may be promulgated pursuant to Title 54.1 of the Code of Virginia. 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. Further, I certify that the proposed changes are exempt from the Administrative Process Act under Code of Virginia §§ 2.2-4006(A)(3) as the changes, “...consist only of changes in style or form or corrections of technical errors.”

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.