



COMMONWEALTH of VIRGINIA

*Office of the Attorney General
Richmond 23219*

Mark R. Herring
Attorney General

202 N. 9th Street
Richmond, Virginia 23219
804 - 786 - 2071
804 - 225 - 4541 TDD

MEMORANDUM

To: Trisha Henshaw
Executive Director
Common Interest Community Board

From: Joshua E. Laws
Assistant Attorney General

Date: March 19, 2020

Subject: Letter of Assurance for Amended Regulations for CIC Manager Licensure - Amend Trade or Fictitious Name Requirements — found at 18 VAC48-50

I have reviewed the Department of Professional and Occupational Regulation, Common Interest Community Board's proposed Amended Regulations for CIC Manager Licensure - Amend Trade or Fictitious Name Requirements — found at 18 VAC48-50 that was posted on the Virginia Regulatory Town Hall on March 18, 2020. In my view, as counsel to the Department of Professional and Occupational Regulation and the Common Interest Community Board, these regulations may be promulgated pursuant to Title 54.1 of the Code of Virginia. Further, I certify that the proposed changes are exempt from the Administrative Process Act under Code of Virginia § 2.2-4006(A)(4)(c) as they are necessary to conform to changes in Virginia statutory law or the appropriation act where no agency discretion is involved. 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.