



# **COMMONWEALTH of VIRGINIA**

*Office of the Attorney General*

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## **MEMORANDUM**

**To:** Kyle Flanders  
Senior Policy Analyst  
Department of Housing and Community Development

**From:** Justin I. Bell  
Assistant Attorney General

**Date:** January 15, 2021

**Subject:** Letter of Assurance for Update to the Virginia Amusement Device Regulations, 13 VAC 5-31.

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I have reviewed the Board of Housing and Community Development's proposed Update to the Virginia Amusement Device Regulations that were posted to the Virginia Regulatory Town Hall. In my view, as counsel to the Board of Housing and Community Development, the Board may propose these regulations pursuant to § 36-98.3 of the *Code of Virginia*. In addition, the Board's action is exempt from Article 2 of the Administrative Process Act (§ 2.2-4000 et seq. of the Code of *Virginia*) pursuant to § 2.2-4006(A)(12).

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.