



# *COMMONWEALTH of VIRGINIA*

*Office of the Attorney General*

Mark R. Herring  
Attorney General

202 North Ninth Street  
Richmond, Virginia 23219  
804-786-2071  
804-371-8946 TDD

## *MEMORANDUM*

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

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

**Date:** January 7, 2020

**Subject:** Letter of Assurance for the Update to the Industrialized Building Safety Regulations, 13 VAC 5 – 91.

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I have reviewed the Department of Housing and Community Development's update to the Industrialized Building Safety Regulations posted on the Virginia Regulatory Town Hall. In my view, as counsel to the Board of Housing and Community Development, this update may be promulgated with these changes pursuant to §§ 36-73 and 2.2-4006(A)(12) 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.

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.