



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: March 14, 2018

SUBJECT: *Regulations Governing the Practice of Pharmacy; Regulations Governing Wholesale Distributors, Manufacturers, and Warehousemen*
18 VAC 110-20; 18VAC 110-50

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18 VAC 110-20, and the *Regulations Governing Wholesale Distributors, Manufacturers, and Warehousemen*, 18VAC 110-50, which were adopted by the Board of Pharmacy on December 11, 2017. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400 and 54.1-3307. The proposed amendments, which include deleting parts of Chapter 20 and re-promulgating them into proposed Chapters 16 and 21, are constitutional and do not conflict with existing federal or state laws or regulations.