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## **MEMORANDUM**

- TO: Dr. David Brown Director Virginia Department of Health Professions
- FROM: James E. Rutkowski Assistant Attorney General
- **DATE:** November 13, 2019
- **SUBJECT:** Regulations Governing Pharmaceutical Processors 18VAC110-60

I have reviewed the proposed *Regulations Governing Pharmaceutical Processors*, 18VAC110-60, which were adopted by the Board of Pharmacy on September 25, 2019. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400, 54.1-3408.3, 54.1-3442.6 and 54.1-3442.7. The proposed regulations are constitutional and do not conflict with state laws or regulations.