



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: C. Ray Davenport
Commissioner
Virginia Department of Labor and Industry

From: Joshua E. Laws
Assistant Attorney General

Date: April 13, 2020

Subject: Letter of Assurance for Amended Regulations for Administrative Regulation Manual — Issuance of Citation and Proposed Penalty — found at 16VAC25-60-260

I have reviewed the Department of Labor and Industry's proposed Amended Regulations for Administrative Regulation Manual — Issuance of Citation and Proposed Penalty — found at 16VAC25-60-260 that was posted on the Virginia Regulatory Town Hall on April 10, 2020. In my view, as counsel to the Department of Labor and Industry, these regulations may be promulgated pursuant to Title 40.1 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)(3) as they consist only of changes in style or form or corrections of technical errors. 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.