



# COMMONWEALTH of VIRGINIA

Office of the Attorney General

Mark R. Herring  
Attorney General

900 East Main Street  
Richmond, Virginia 23219  
804-786-2071  
FAX 804-786-1991  
Virginia Relay Services  
800-828-1120  
7-1-1

## MEMORANDUM

**To:** Lucia Anna Trigiani, Board Chair  
Common Interest Community Board  
Department of Professional and Occupational Regulation

Trisha Henshaw, Executive Director  
Common Interest Community Board  
Department of Professional and Occupational Regulation

**From:** James M. Flaherty  
Assistant Attorney General

**Date:** December 3, 2014

**Subject:** Letter of Assurance for Amendments to Time Share Regulations, 18 VAC 48-40 *et seq.*

---

I have reviewed the Common Interest Community Board's proposed amendments to its Time Share Regulations, particularly to 18 VAC 48-40 *et seq.*, that were posted on the Virginia Regulatory Town Hall on December 3, 2014. In my view, as counsel to the Common Interest Community Board, these regulations may be promulgated pursuant to Title 55, Chapter 21 of the *Code of Virginia*. The regulation does not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor does it 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 regulation.