



**COMMONWEALTH of VIRGINIA**  
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***MEMORANDUM***

**To:** Daniel Gade  
Commissioner, Virginia Department of Veterans Services

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

**Date:** May 24, 2023

**Subject:** Letter of Assurance for Amended Regulation – Amendment to 100% Disabled Veteran Real Property Tax Exemption found at 1VAC80-10-100

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I have reviewed the Virginia Department of Veterans Services' proposed Amendment to 100% Disabled Veteran Real Property Tax Exemption found at 1VAC80-10-100 that was posted on the Virginia Regulatory Town Hall on May 5, 2023. In my view, as counsel to the Virginia Department of Veterans Services, this regulation may be promulgated pursuant to Title 58.1 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. The regulation also appears to be exempt from the rulemaking process under § 2.2-4002(A)(24) of the Code of Virginia.

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.