



# COMMONWEALTH of VIRGINIA

*Office of the Attorney General*

**Mark R. Herring**  
Attorney General

202 North 9th Street  
Richmond, Virginia 23219  
804-786-2071  
FAX 804-786-1991  
Virginia Relay Services  
800-828-1120  
7-1-1

## MEMORANDUM

**TO:** Dr. David Brown  
Director  
Virginia Department of Health Professions

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** May 1, 2018

**SUBJECT:** *Regulations Governing the Practice of Pharmacy; Regulations for Practitioners of the Healing Arts to Sell Controlled Substances; Regulations Governing Wholesale Distributors, Manufacturers and Warehousemen*  
18VAC110-20; 18VAC110-30; 18VAC110-50

I have reviewed the amendments to the *Regulations Governing the Practice of Pharmacy, Regulations for Practitioners of the Healing Arts to Sell Controlled Substances, and the Regulations Governing Wholesale Distributors, Manufacturers and Warehousemen*, 18VAC110-20, 18VAC110-30, and 18VAC110-50 as adopted by the Board of Pharmacy on March 29, 2018. The Board has the statutory authority to adopt the regulations under Virginia Code §§ 54.1-113 and 54.1-2400. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.