



COMMONWEALTH of VIRGINIA

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MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: May 1, 2019

SUBJECT: *Regulations Governing Wholesale Distributors, Manufacturers, Warehouses, and Third-Party Logistics Providers*
18 VAC 110-50

I have reviewed the proposed amendments to the *Regulations Governing Wholesale Distributors, Manufacturers, Warehouses, and Third-Party Logistics Providers*, 18 VAC 110-50, which were adopted by the Board of Pharmacy on March 26, 2019. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400, 54.1-3415.1, and 2018 Va. Acts ch. 241. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.