



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: Michael Menefee
Division of Consumer Protection
Department of Agriculture and Consumer Services

From: Joshua E. Laws
Assistant Attorney General
Counsel to the Charitable Gaming Board

Date: June 27, 2016

Subject: Letter of Approval for Proposed Regulations - 11 VAC 15-40 – Amendments to revise the limits on the number of electronic pull-tab devices that may be operated by qualified charitable organizations at various qualified sites

I have reviewed the Charitable Gaming Board's Proposed Amendments to revise the limits on the number of electronic pull-tab devices that may be operated by qualified charitable organizations at various qualified sites found at 11 VAC 15-40-300 that were posted on the Virginia Regulatory Town Hall on June 27, 2016. In my view, as counsel to the Charitable Gaming Board, the Board may promulgate these regulations, pursuant to § 18.2-340.15 of the *Code of Virginia*. The regulations do not appear, on their face, to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with federal or state law currently in effect.

This memorandum addresses legal matters only, is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed, regulations, and does not address, or express a position on, matters of public policy.