



# **COMMONWEALTH of VIRGINIA**

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## **MEMORANDUM**

**To:** Gary G. Pan  
Commissioner  
Virginia Department of Labor and Industry

**From:** Joshua E. Laws  
Senior Assistant Attorney General

**Date:** December 17, 2024

**Subject:** Letter of Assurance for Proposed Regulations for Local Government Union Requirements and Employee Protections — found at 16 VAC15-70

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I have reviewed the Department of Labor and Industry's proposed Regulations for Local Government Union Requirements and Employee Protections found at 16 VAC15-70 that were posted on the Virginia Regulatory Town Hall on December 13, 2024. In my view, as counsel to the Department of Labor and Industry, these regulations may be promulgated pursuant to Title 40.1 of the Code of Virginia. The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they 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 regulations.