



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: Stephen Kirschner
Regulatory Operations Administrator
Department of Professional and Occupational Regulation

From: Joshua E. Laws
Assistant Attorney General

Date: May 29, 2019

Subject: Letter of Assurance for Periodic Review of Regulations – Board for Barbers and Cosmetology –
Tattooing Regulations found at 18 VAC 41-50

Pursuant to the Code of Virginia and Executive Order 14 (2018), a periodic review of a regulation every four years shall include an examination by the Office of the Attorney General to ensure statutory authority. In that regard, I have reviewed the Board for Barbers and Cosmetology's regulation referenced above. In my view, as counsel to the Department of Professional and Occupational Regulation, these regulations may be promulgated pursuant to Titles 2.2 and 54.1 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.