

**Virginia Code Commission  
Meeting Materials  
June 3, 2026**

# VIRGINIA CODE COMMISSION

**Monday, November 17, 2025 - 10:00 a.m.**

*House Committee Room B - General Assembly Building*

**DRAFT**

## Meeting Minutes

**Members Present:** Marcus B. Simon, Ryan T. McDougle, Katrina E. Callsen, Malfourd W. Trumbo, Michael P. Mullin, Charles S. Sharp, Richard E. Gardiner, Nicole S. Cheuk, Steven Popps, Amigo R Wade.

**Members Absent:** Russet W. Perry, Christopher R. Nolen.

**Staff Present:** Holly Trice, Nikki Clemons, Meg Lamb, Joanne Frye, Keelin Cronin, Casey Nelson, Division of Legislative Services

**Others Present:** Andrew Clark, Home Builders Association of Virginia; Mary Zirkle, Town of Bedford; Michelle Gowdy, Virginia Municipal League; A. Cottrell; Jerry Stonefield, Fairfax County.

**Call to Order:** Delegate Simon, chair, called the meeting to order at 10:00 a.m. Ms. Holly Trice, Registrar of Regulations, reminded the public of how to send a public comment via email and called role.

A quorum of the commission was present virtually.

**Review and approval of October 22, 2025, minutes:** A motion was made to approve the minutes, properly seconded, and passed unanimously.

**Recodification of Title 30: Presentation and approval of draft bill for 2026 Session of the General Assembly - Meg Lamb; Joanne Frye; Keelin Cronin; Casey Nelson, DLS:** Joanne Frye, Division of Legislative Services, presented a 205 page bill for the recodification of Title 30. Chair Simon was selected as the patron for the bill. Senator McDougle voiced concerns regarding § 30-13 of the Code of Virginia, which requires mailing two physical copies of proposed amendments to the Constitution to every clerk's office for inspection, feeling that this section should be reinserted into the bill. Chair Simon stated that this requirement does not happen anymore, and that a letter regarding amendments is sent to the clerks. Clerks also have to send notices regarding the amendments in the following year, but that also has not happened in recent memory. Senator McDougle continued to voice concerns regarding the need for the continued inclusion of this language. A motion to approve the Title 30 recodification draft bill was made and seconded. The motion was approved by roll call vote.

<b>Motion to Approve Title 30 Recodification Draft Bill</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
Katrina Callsen	1			
Nicole Cheuk	1			
Richard Gardiner	1			
Ryan McDougle		1		

Virginia Code Commission Meeting Minutes

November 17, 2025

Page 2 of 4

Michael Mullin	1			
Christopher R. Nolen				1
Russet Perry				1
Steven Poppo		1		
Charles S. Sharp	1			
Marcus Simon	1			
Malfourd W. Trumbo	1			
Amigo R. Wade	1			
Total	8	2		2

**Status Update: House Bill 2660 Work Group - Andrew Clark, Home Builders Association of Virginia; Michelle Gowdy, Virginia Municipal League:**

Mr. Andrew Clark and Ms. Michelle Gowdy presented on the work group for HB2660. The work group consists of people in the commercial and residential industry, VACO, VML, local government attorneys, and municipal stormwater authorities. There have been seven meetings since May of 2025, during which the group worked to review statute and build consensus around amendments aimed to reorganize and clean up language. Amendments include consolidating definitions, delineating review track, clarifying terminology, and erasing repetitive requirements. The work group's recommendation is to request more time so the group can clarify lingering items and to speak to constituents. Ms. Gowdy asked how the work group could extend for another year. Director Wade stated that the enactment clause could be amended to add an additional year. A motion to amend the enactment clause to extend the HB2660 Work Group an additional year was made and appropriately seconded. The motion was approved unanimously.

<b>Motion to Approve 5% increase to LexisNexis</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
Katrina Callsen	1			
Nicole Cheuk	1			
Richard Gardiner	1			
Ryan McDougale	1			
Michael Mullin	1			
Christopher R. Nolen				1
Russet Perry				1
Steven Poppo	1			

Virginia Code Commission Meeting Minutes

November 17, 2025

Page 3 of 4

Charles S. Sharp	1			
Marcus Simon	1			
Malfourd W. Trumbo	1			
Amigo R. Wade	1			
Total	10			2

**Potential Clarification Needed in Existing Statute, § 2.2-4002 - Tom Lisk, Administrative Law Advisory Committee:**

Mr. Tom Lisk was not able to attend the meeting, so Ms. Holly Trice presented the item. The Virginia Registrar's Office currently requires that the office receive a letter from agencies' counsel certifying that they can promulgate regulations and, in certain cases, can use exemptions. In the second paragraph of a letter from the Attorney General's Office, there was a citation to § 2.2-4002B 4 of the Code of Virginia, which specifically grants exemptions to actions relating to grants and funds for general property. The letter interpreted this language to exempt agencies from promulgating regulations at all regarding federal or state grants, which concerned ALAC that this interpretation of § 2.2-4002B was potentially incorrect. ALAC asked the commission if the section needs clarification. Director Wade noted that there could be ramifications with some agencies if the section is interpreted in that way.

Under § 30-155 of the Code of Virginia, the commission has the charge to continuously monitor the operation of the Administrative Process Act and Register Act to ensure that those laws provide the most practical means to administrative agencies of the Commonwealth for the promulgation, amendment and repeal of administrative law within the powers granted to such agencies by the General Assembly, and to recommend from time to time such changes as it deems appropriate.

Judge Trumbo asked when Article 2 of the Administrative Process Act was last reviewed. Director Wade shared that it was last reviewed in 2001. Judge Trumbo asked if the commission might review the APA and Director Wade suggested ALAC review it. A motion for ALAC to review Articles 1 and 2 of the Administrative Process Act and it was appropriately seconded. The motion passed unanimously.

<b>Motion to request ALAC review Articles 1 and 2 of the APA</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
Katrina Callsen	1			
Nicole Cheuk	1			
Richard Gardiner	1			
Ryan McDougale	1			
Michael Mullin	1			
Christopher R. Nolen				1

Virginia Code Commission Meeting Minutes

November 17, 2025

Page 4 of 4

Russet Perry				1
Steven Poppo	1			
Charles S. Sharp	1			
Marcus Simon	1			
Malfourd W. Trumbo	1			
Amigo R. Wade	1			
Total	10	0	0	2

**Other Business:**

No other business was brought to the commission.

**Public comment:** Chair Simon asked if there were any members of the public who wished to offer comment. No one present at the meeting wished to comment, and no one had commented virtually via the email address provided for comment.

**Adjourn:** A motion was made for adjournment, seconded, and passed unanimously.

Chair Simon adjourned the meeting at 10:37 a.m.



# COMMONWEALTH of VIRGINIA

## VIRGINIA CODE COMMISSION

Delegate Marcus B. Simon, Chair  
Senator Russet W. Perry, Vice Chair

General Assembly Building  
201 North Ninth Street Richmond,  
Virginia 23219  
(804) 698-1883  
<http://codecommission.dls.virginia.gov>

**DRAFT**

### Virginia Code Commission Policy for

#### Electronic Meetings Held under § 2.2-3708.3 of the Code of Virginia

This policy shall apply to the entire membership of the Virginia Code Commission ("Code Commission") and without regard to the identity of the member requesting remote participation or the matters that will be considered or voted on at the meeting. Whenever an individual member wishes to participate from a remote location, the law requires a quorum of the Code Commission to be physically assembled at the primary or central meeting location.

- I. Remote Participation by an Individual Member of the Code Commission
  - A. It is the policy of the Code Commission that individual members may participate in meetings of the Code Commission by electronic communication as permitted by § 2.2-3708.3 of the Code of Virginia.
  - B. When such individual participation is due to a personal matter, such participation is limited by law to two meetings per calendar year or 25 percent of the meetings held per calendar year rounded up to the next whole number, whichever is greater.
  - C. Individual participation from a remote location shall be approved unless

#### Commission Members:

*Katrina E. Callsen  
Nicole Cheuk  
Richard E. Gardiner  
Travis Hill*

*Ryan T. McDougle  
Michael P. Mullin  
Christopher R. Nolen  
Russet Perry*

*Charles S. Sharp  
Marcus Simon  
Malfourd W. Trumbo  
Amigo R. Wade*

such participation would violate this policy or the provisions of the Virginia Freedom of Information Act (§ 2.2-3700 et seq. of the Code of Virginia). If a member's participation from a remote location is challenged, then the Code Commission shall vote whether to allow such participation.

## II. Remote Participation by the Entire Body

- A. It is the policy of the Code Commission that the Code Commission may hold all virtual public meetings pursuant to subsection C of § 2.2-3708.3.
- B. Requests for remote participation or that the Code Commission conduct an all-virtual public meeting shall be conveyed to staff to the Code Commission who shall then relay such requests to the chair of the public body.
- C. Such all-virtual public meetings are also limited by law to two meetings per calendar year or 50 percent of the meetings held per calendar year rounded up to the next whole number, whichever is greater.
- D. Additionally, an all-virtual public meeting may not be held consecutively with another all-virtual public meeting.

## III. Minutes Requirements


- A. The request for remote participation or that the Code Commission conduct an all-virtual public meeting shall be recorded in the minutes of the meeting.
- B. If the Code Commission votes to disapprove of the member's participation because such participation would violate this policy, such disapproval shall be recorded in the minutes with specificity.
- C. The minutes shall include other information as required by §§ 2.2-3707 and 2.2-3708.3 depending on the type of remote participation or all-virtual public meeting.

### **Commission Members:**

*Katrina E. Callsen  
Nicole Cheuk  
Richard E. Gardiner  
Travis Hill*

*Ryan T. McDougle  
Michael P. Mullin  
Christopher R. Nolen  
Russet Perry*

*Charles S. Sharp  
Marcus Simon  
Malfourd W. Trumbo  
Amigo R. Wade*

<b>Commonwealth of Virginia</b>		
Thomas A. Lisk, Chair  <hr/> Andrew Kubincanek, Program Coordinator		General Assembly Building 201 N. 9th Street, Fourth Floor Richmond, Virginia 23219 (Phone) 804-698-1810 akubincanek@dls.virginia.gov <a href="http://codecommission.dls.virginia.gov/alac/alac.shtml">http://codecommission.dls.virginia.gov/alac/alac.shtml</a>
<b>Administrative Law Advisory Committee</b>		

## **2026 Work Plan Draft Administrative Law Advisory Committee**

### **Virginia Administrative Process Act Article 2 Study**

ALAC will form a work group to study and update Article 2 of the Virginia Administrative Process Act. ALAC has identified a grammatical issue in § 2.2-4012 B, along with several other items which may require clarification, including the definition of “adverse effects” in § 2.2-4007, and comment periods after the deletion of a guidance document and after the publication of a final adopted regulation. ALAC will work with the Department of Planning and Budget and other stakeholders to review these issues and will continue to study Article 2 for additional issues.

### **Preservation of Error Doctrine**

ALAC previously formed a work group to study how the preservation of error doctrine and the procedural default rule apply in the regulatory context. The work group initiated a survey of other state codes on the preservation of error doctrine and procedural default and will continue collecting data.

### **Harmless Error Doctrine**

ALAC previously formed a work group to discuss amending language on harmless error in § 2.2-4027 to more closely conform with federal law and other state laws. The work group will continue to study this issue and further refine the language.

Thomas A. Lisk, Chair  
 John Daniel  
 Michelle Gowdy  
 Paul Kugelman

Craig Maxey  
 Jeffrey S. Palmore  
 Mike Quinan  
 Brooks Smith

Noah P. Sullivan  
 Holly Trice  
 Jennifer Williamson  
 Kristi S. Wright



**COMMONWEALTH of VIRGINIA**  
*Office of the Attorney General*

**Jay Jones**  
Attorney General

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

February 19, 2026

The Honorable Marcus B. Simon  
Member, Virginia House of Delegates  
Chair, Virginia Code Commission  
Post Office Box 958  
Falls Church, Virginia 22040

Dear Delegate Simon:

I am responding to your request for an official advisory opinion in accordance with § 2.2-505 of the *Code of Virginia*.

**Issue Presented**

You inquire whether certain provisions of the Charter for the City of Virginia Beach that relate to courts not of record were repealed with the enactment of Chapter 4.1 of Title 16.1, specifically § 16.1-69.1.<sup>1</sup>

**Background**

The incorporation of Virginia Beach dates back to 1906,<sup>2</sup> and its current Charter was adopted in 1962 when the former Princess Anne County was consolidated into the City.<sup>3</sup> The General Assembly included provisions related to the “Administration of Justice” in Chapter 20 of the 1962 Charter.

---

<sup>1</sup> VA. CODE ANN. § 16.1-69.1 (2025) (“All acts and parts of acts, all sections of this Code, and all provisions of municipal charters, inconsistent with the provisions of this title, as amended, are, except as herein otherwise provided, repealed to the extent of such inconsistency.”).

<sup>2</sup> Virginia Beach initially was incorporated as a town, 1906 Va. Acts ch. 76, and first was rechartered as a city in 1952. 1952 Va. Acts ch. 33.

<sup>3</sup> 1962 Va. Acts ch. 147.

In 1972, during its regular session, the General Assembly undertook a comprehensive overhaul of Virginia's court system. Pursuant to its authority under the new Constitution,<sup>4</sup> the General Assembly passed legislation amending Title 16.1 to establish, at the court-not-of-record level, a new "district court system [to] be within the unified court system of the Commonwealth subordinate to the Supreme Court and subject to the administrative supervision of the Chief Justice of the Supreme Court."<sup>5</sup> The act set forth key definitions: "courts not of record" was to mean "all courts . . . below the jurisdictional level of the circuit and corporation courts including general district courts and juvenile courts"—which courts collectively also constituted "district courts"—and "general district courts" included "all courts in . . . cities heretofore designated as . . . municipal courts" while "municipal courts" conversely were "deemed to refer to general district courts[.]"<sup>6</sup>

The legislation further provided that extant municipal courts in each city would merge, as necessary, and "continue as the general district court of the city with the same powers and territorial jurisdiction over such city[.]"<sup>7</sup> To ensure a fully effective transition, the General Assembly also included a "repealing clause" whereby "all provisions of municipal charters, inconsistent with [Title 16.1], as amended, are, except as herein otherwise provided, repealed to the extent of such inconsistency."<sup>8</sup> Certain courts of limited jurisdiction were also abolished and their jurisdiction turned over to the new district courts.<sup>9</sup>

The legislation was reenacted in the 1973 Session, the amendments became operative, as intended, on July 1, 1973.<sup>10</sup> The repealing clause, subsequently codified as § 16.1-69.1, also took effect the same day.<sup>11</sup>

### Applicable Law and Discussion

The statutory provision involved is § 16.1-69.1, which is the repealing clause and this statute reads as follows:

"All acts and parts of acts, all sections of this Code, and all provisions of municipal charters, inconsistent with the provisions of this title, as amended, are, except as herein otherwise provided, repealed to the extent of such inconsistency."

---

<sup>4</sup> VA. CONST., art. VI, § 8.

<sup>5</sup> 1972 Va. Acts ch. 708 (adding anticipated § 16.1-1.30).

<sup>6</sup> *Id.* (providing for the enactment of an anticipated § 16.1-1.5 as a transitional provision; municipal courts are defined in § 16.1-1.8[b]).

<sup>7</sup> *Id.* (establishing anticipated § 16.1-1.8(b)). The General Assembly also provided that personnel of the municipal courts would "continue in office in like positions with the general district courts . . . until the expiration of the term, if any, for which elected or appointed." *Id.* (creating anticipated § 16.1-1.37(b)).

<sup>8</sup> *Id.* (setting forth anticipated § 16.1-69.1 as a transitional provision).

<sup>9</sup> *See id.* (establishing anticipated § 16.1-70.1: "The courts of limited jurisdiction continued or authorized pursuant to this chapter and in operation June thirty, nineteen hundred seventy-three, are hereby abolished, . . . [A]ll jurisdiction and power conferred upon any such court in any city or town shall pass to and be exercised by the district courts having jurisdiction over such city or town.")

<sup>10</sup> 1973 Va. Acts ch. 546.

<sup>11</sup> *Id.*

This statute is in Chapter 4.1,<sup>12</sup> of Title 16 of the Virginia Code which currently contains §§ 16.1-69.1 through 16.1-69.58. This chapter is meant to be the establishment of the district court system as part of “the unified court system of the Commonwealth . . . .”<sup>13</sup> By its very terms, §16.1-69.1 overrides and repeals any inconsistent provisions in any county, city or town charter, including the Charter of the City of Virginia Beach. It is unambiguous and plainly within the constitutional powers of the General Assembly.<sup>14</sup> In considering legislative amendments, there is a presumption that the General Assembly “acted with full knowledge of and in reference to the existing law upon the same subject and the construction placed upon it by the courts.”<sup>15</sup> Constructions that render statutory amendments meaningless are to be avoided.<sup>16</sup>

To determine whether a city charter provision is inconsistent with Chapter 4.1 of Title 16 of the Virginia Code, each charter provision must be examined. These provisions of the City Charter of the City of Virginia Beach are most likely to be affected by the repealing statute. I examined each *seriatim*.

Charter provision § 20.01 establishes that the Circuit Court of the City of Virginia Beach is in the Second Circuit and the Circuit Court of Princess Anne County shall be known as the Circuit Court of the City of Virginia Beach. This provision is governed by the Circuit Court statutes and should be treated as repealed.<sup>17</sup> To the extent this Charter provision has any bearing on the district courts, this provision is inconsistent with § 16.1-69.6 and thus repealed by § 16.1-69.1. Present § 16.1-69.6 establishes the City of Virginia Beach as the Second District and the Counties of Accomack and Northampton as District 2-A.

Charter provision § 20.02 establishes a transition from the Princess Anne Circuit Court to the new unified Virginia Beach Circuit Court for pending cases. This provision is not repealed nor inconsistent but it only has historical meaning now.

Charter provisions § 20.03 through § 20.07 as they refer to the municipal court or the juvenile and domestic relations court or a county court, are repealed and replaced by § 16.1-69.8, which replaces the county court with the general district court,<sup>18</sup> municipal courts of cities are replaced by the general district

---

<sup>12</sup> 1972 Va. Acts ch. 708; 1973 Va. Acts ch. 546.

<sup>13</sup> VA. CODE ANN. § 16.1-69.30 (2025).

<sup>14</sup> See VA. CONST., art. VI, § 8. (“The General Assembly may provide for additional judicial personnel, such as judges of courts not of record and magistrates or justices of the peace, and may prescribe their jurisdiction and provide the manner in which they shall be selected and the terms for which they shall serve.”).

<sup>15</sup> *Burke v. Commonwealth*, 29 Va. App. 183, 188 (1999) (quoting *City of Richmond v. Sutherland*, 114 Va. 688, 693 (1913)). See also *Commonwealth v. Bruhn*, 264 Va. 597, 602 (2002) (“[I]n construing a statute that has been amended by the General Assembly, we presume that the legislature acted with full knowledge of the law as it affected the subject matter.”).

<sup>16</sup> See *Shoemaker v. Funkhouser*, 299 Va. 471, 487 (2021) (noting that courts “disfavor a construction of statutes that renders any part of the statute useless or superfluous.”).

<sup>17</sup> See 1998 Va. Acts ch. 872. This act established the circuit court system and changed the name of various former courts of record such as hustings and corporation courts. See Section 17.1-500 (2025). Present § 17.1-506(2) (2025) placed the Counties of Accomack and Northampton and the City of Virginia Beach in the Second Judicial Circuit. That statute, being comprehensive throughout the Commonwealth, supersedes any city charter provision to the contrary.

<sup>18</sup> Section 16.1-69.8(a) (2025).

court,<sup>19</sup> the city juvenile and domestic relations courts are now juvenile and domestic relations district courts, and the municipal courts of any town are abolished and their jurisdiction replaced with the general district court.<sup>20</sup> These Charter sections are repealed by § 16.1-69.1 by virtue of their repeal and replacement by the terms of § 16.1-69.8.

Charter provision § 20.08 is a transitional provision similar in terms to Charter provision § 20.02 except applying to the county court and the police court of Princess Anne County and it is not repealed but inconsistent with § 16.1-69.8 except for the reference to the former municipal courts which have been replaced by the general district court by §16.1-69.8. To the extent this provision has any authority, it is repealed by § 16.1-69.1 and § 16.1-69.8.

Charter provision § 20.09 establishes a single clerk for all the courts not of record or one clerk for each separate court not of record. This provision is inconsistent with §16.1-69.37 (clerks remain until their term ends), §16.1-69.39 (all personnel including clerks shall serve at the pleasure of the chief judge of that district court), and §16.1-69.40 (powers and duties of clerks and deputy clerks) and thus Charter provision § 20.09 is repealed by § 16.1-69.1 by virtue of the repeal and replacement of this charter provision by the aforesaid Code sections cited in this paragraph.

Charter provision § 20.10 authorizes records of the county court of Princess Anne County and the police court of the City of Virginia Beach to be maintained by the appropriate successor court and was not affected by the 1972 and 1973 reorganization of the district courts. The General Assembly in 1983 added to Chapter 4.1 of Title 16.1 the terms of Article 6 of Chapter 4.1 (§ 16.1-69.53, *et seq.*)<sup>21</sup> which had the effect of repealing and replacing charter provision § 20.10 and thus charter provision § 20.10 was repealed by § .and Article 6 of Chapter 4.1 of the Virginia Code.

Charter provision § 20.11 established or retained the position of High Constable<sup>22</sup> and Charter provision § 20.12 established or retained the position of Justice of the Peace. Neither of these positions are part of the former courts not of record system that was repealed by Chapter 4.1 of the Virginia Code and thus the repealer statute does not apply to these sections.

Notwithstanding the survival of these offices in the reorganization of the district courts, these Charter provisions §§ 20.11 and 20.12 were specifically repealed by the 1995 General Assembly.<sup>23</sup> This had the effect of abolishing both the position of the High Constable and the Justice of the Peace. The 1996 General Assembly enacted a new Charter provision (Section 20.14) which reestablished the position of “High Constable”.<sup>24</sup> The City Council of Virginia Beach has established in its Code the office of High

---

<sup>19</sup> Section 16.1-69.8(b). There is a reference to “courts of limited jurisdiction established pursuant to Chapter 5 (§16.1-70 *et seq.*) of this title . . . .” as an exception of the establishment of a unified district court system; however, this reference was repealed in 2018 Va. Acts ch. 164.

<sup>20</sup> Section 16.1-69.8(d).

<sup>21</sup> 1983 Va. Acts ch. 499.

<sup>22</sup> By virtue of 1962 Va. Acts ch. 147, enacting CHARTER FOR THE CITY OF VIRGINIA BEACH, VA., § 20-11, the High Constable “shall be the ministerial officer of the courts of the city and shall have such duties as the council may prescribe.”

<sup>23</sup> 1995 Va. Acts ch. 607 (“That §§ 20.11 and 20.12 of Chapter 147 of the Acts of Assembly of 1962 are repealed.”).

<sup>24</sup> 1996 Va. Acts ch. 360; CHARTER FOR THE CITY OF VIRGINIA BEACH, VA., § 20-14. (“The council shall appoint a high constable who shall serve at the pleasure of the council. He shall execute all processes, warrants, summons, and notices in the general district court and shall have such other duties as the council may prescribe. The fees collected

Constable for the City of Virginia Beach and then declared the Sheriff of the City of Virginia Beach to be the High Constable for the city.<sup>25</sup> The High Constable still serves judicial process and other legal papers arising from the General District Court. Since one of the statutory duties of the Sheriff is to “assist in the judicial process . . . .”<sup>26</sup> and there is no provision in Title 16.1 abolishing the High Constable, this Charter provision was not affected by § 16.1-69.1.<sup>27</sup>

Charter provision § 20.12 (Justice of the Peace) was not reenacted in 1996; Justices of the Peace were not affected by the reform of the district court system but have been abolished by virtue of §§ 19.2-31 and 19.2-32 and replaced by magistrates.<sup>28</sup>

Charter provision § 20.13 governs notaries in Princess Anne County until their commission expires and since this provision was enacted in 1962 and under § 47.1-21 a notarial commission was four years, this provision is transitional. Charter provision §20.13 was not repealed by §16.1-69.1 but is largely of historical value today.

I did not find other sections of the Charter of the City of Virginia Beach that pertained to the establishment or maintenance of district courts.

There is one potential objection that must be answered. A prior Opinion of this Office states:

A recognized principle of statutory construction is that where a charter and a statute conflict, the charter controls. There are, however, several exceptions to this principle. Because the goal of statutory construction is to discern and give effect to the intent of the legislature, a statute will control where the language of the statute evidences a clear legislative intent that it is to prevail over any conflicting charter provision.<sup>[29]</sup>

This Office adheres to this 1997 Opinion subject to the facts presented in that opinion.<sup>30</sup> The Attorney General gave his opinion in 1997 that the state statute controlled over the two charter provisions

---

by the high constable shall be established by duly adopted ordinance, and all such fees shall be deposited into the city treasury for use in the general operation of the city. The sheriff may act as the high constable.”).

<sup>25</sup> The CITY OF VIRGINIA BEACH, VA., Code § 2-463 (Ord. No. 2384, enacted May 14, 1996) reestablished the position of “high constable” with the identical powers in almost the identical wording as the CHARTER FOR THE CITY OF VIRGINIA BEACH, VA., § 20.14 and then in the previous section (CITY OF VIRGINIA BEACH, VA., Code § 2-462) declared the Sheriff of the City of Virginia Beach to be the High Constable. The fees collected by the High Constable of Virginia Beach “shall be deposited into the city treasury for the general operation of the city.” CITY OF VIRGINIA BEACH, VA., Code § 2-463.

<sup>26</sup> VA. CODE ANN. § 15.2-1609 (2018).

<sup>27</sup> CHARTER FOR THE CITY OF VIRGINIA BEACH, VA., § 20-14. I would note that VA. CODE ANN. § 8.01-293(B)(iii) (2024) acknowledges the existence of the High Constable of the City of Virginia Beach as one of four officials who may levy upon certain property (“a sheriff, the high constable for the City of Norfolk or Virginia Beach, or a treasurer may levy upon property.”).

<sup>28</sup> See VA. CODE ANN. §§ 19.2-31 and 32 (2022).

<sup>29</sup> 1997 Op. Va. Att’y Gen. 46, 46.

<sup>30</sup> The issue in the 1997 Opinion was a conflict between a statute requiring an independent auditor [Former § 15.1-167, now § 15.2-2511 (Supp. 2025)] and two charter provisions of the City of Roanoke establishing a municipal auditor [CHARTER FOR THE CITY OF ROANOKE, VA., § 9] and stating as one of his duties to be the general audit of all municipal accounts, including the Commissioner of the Revenue [CHARTER FOR THE CITY OF ROANOKE, VA., §25.2].

since the “clear legislative intent” was for the comprehensive Code section to prevail over all existing charter provisions.<sup>31</sup>

My opinion is that the clear legislative intent to establish a uniform district court system for all jurisdictions in Virginia prevails over any charter provision to the contrary and §16.1-69.1 makes that intent clear when that Code section states expressly that “all provisions of municipal charters” are amended or repealed in the event of an inconsistency.<sup>32</sup>

### Conclusion

Accordingly, it is my opinion that the sections of the Charter of the City of Virginia Beach stated above have been repealed by §16.1-69.1 or in some cases by other acts of the General Assembly.

Attached please find a list of the repealed Charter provisions as well as some other Charter provisions discussed in the text of this Opinion.

With kindest regards, I am,

Very truly yours,



Jay Jones  
Attorney General

---

<sup>31</sup> 1997 Op. Va. Att’y Gen 46, 46-47. The Attorney General referred to a 1993 General Assembly amendment that deleted prior language exempting municipal charters to the contrary.

<sup>32</sup> See also §§ 16.1-6 (“On and after [July 1, 1973], the Commonwealth shall be divided into districts encompassing all counties and cities in the Commonwealth to provide a basis for the sound and efficient administration of the courts not of record.”), 16.1-69.7 (District Courts established), and 16.1-69.8 (Existing courts converted or abolished). See also *County School Bd. v. Town of Herndon*, 194 Va. 810, 816 (1953) (“But here an important provision of a comprehensive act, which changed the organization and form of county government and which took effect subsequent to enactment of the special or local law, is found to be in conflict with the special legislation. No ordinary case of repeal by implication is presented, but one which unerringly prompts the belief and makes certain the conviction that the legislature manifestly intended that the comprehensive act should prevail over the special legislation and be thus given full force and effect when the new government became operative.”)

## REPEALED PROVISIONS OF THE CHARTER OF THE CITY OF VIRGINIA BEACH

### Chapter 20. Administration of Justice.

#### **§ 20.01. Circuit court.**

Not repealed by VA. CODE ANN. § 16.1-69.1 except as it might pertain to the district courts but is repealed by the establishment of the circuit court system in 1998. See text for details.

The city shall continue to be in and a part of the Second Judicial Circuit. The Circuit Court of Princess Anne County shall be known as the Circuit Court of the City of Virginia Beach and shall have the same jurisdiction in the city of Virginia Beach as is conferred by general law upon circuit courts of cities of the first class. (1962, c. 147; 1978, c. 101)

#### **§ 20.02. Transition of circuit court.**

Not repealed

#### **§ 20.03. Courts not of record; municipal courts generally.**

The municipal courts for the City of Virginia Beach shall be designated as Civil Court, Police Court and Traffic Court, with such civil and criminal jurisdiction, and other judicial powers as are conferred by general law on municipal courts of cities of the first class. With the approval of the city council, civil and criminal jurisdiction, other than traffic, may be exercised by a single court. (1962, c. 147; 1972, c. 810)

#### **§ 20.04. Courts not of record; judges of the municipal courts.**

There shall be a judge for each municipal court and such substitute judges as may be deemed necessary by the council. The judges of such courts shall be appointed for terms of four years by the Circuit Court of the city or the judges thereof in vacation. The same person may be appointed and serve as judge of two or more municipal courts. Appointments to vacancies shall be made by the Circuit Court or the judges thereof in vacation and shall be for the unexpired term. (1962, c. 147; 1972, c. 810)

#### **§ 20.05. Juvenile and domestic relations court.**

There shall be a juvenile and domestic relations court for the city. Such court shall possess the same jurisdiction and powers as are conferred by law upon juvenile and domestic relations courts of cities of the first class. (1962, c. 147)

#### **§ 20.06. Judges of the juvenile and domestic relations court.**

There shall be a judge of the juvenile and domestic relations court and such associate and substitute judges as may be deemed necessary by the council. The judges of such court shall be appointed for terms of four years by the circuit court of the city or the judges thereof in vacation. Appointments to vacancies shall be made by the circuit court or the judges thereof in vacation and shall be for the unexpired term. (1962, c. 147)

#### **§ 20.07. Judges of courts not of record.**

Any judge, or substitute judge of any municipal court may also be the judge, or associate judge or substitute judge of the juvenile and domestic relations court. (1962, c. 147; 1972, c. 810)

**§ 20.08. Transition of courts not of record.**

All actions of every kind, criminal as well as civil, pending in the county court of Princess Anne County or the police court of the City of Virginia Beach on the effective date of this charter shall automatically be transferred to, and shall proceed to final judgment in the municipal court or the juvenile and domestic relations court of the city, as the judges thereof may determine. (1962, c. 147)

**§ 20.09. Clerk of courts not of record.**

The council may, at its discretion, provide for a single clerk for all courts not of record or a separate clerk for each court not of record. The clerk or clerks shall be appointed by the court or courts he serves. (1962, c. 147; 1972, c. 810)

**§ 20.10. Transfer of records.**

Repealed by both VA. CODE ANN. § 16.1-69.1 and by VA. CODE ANN. § 16.1-69.53, *et seq.*

Upon the effective date of this charter all records and papers of the county court of Princess Anne County and the police court of the City of Virginia Beach shall be transferred to the appropriate courts of the city. (1962, c. 147)

**§ 20.11 (1962, c. 147; repealed, 1995, c. 607)**

Not repealed by VA. CODE ANN. § 16.1-69.1; see text for details.

**§ 20.12. (1962, c. 147; repealed, 1995, c. 607)**

Not repealed by VA. CODE ANN. § 16.1-69.1; see text for details.

**§ 20.13. Notaries public.**

Not repealed

**§ 20.14. High constable.**

Not repealed; see text for details. This is the present provision governing the High Constable:

The council shall appoint a high constable who shall serve at the pleasure of the council. He shall execute all processes, warrants, summons, and notices in the general district court and shall have such other duties as the council may prescribe. The fees collected by the high constable shall be established by duly adopted ordinance, and all such fees shall be deposited into the city treasury for use in the general operation of the city. The sheriff may act as the high constable. (1996, c. 360)

## 2026 Session of the General Assembly

### Code Commission Bills

Bill No. and Patron	Subject	Status
HB 135 Del. Marcus Simon	Virginia Code Commission; extends subdivision plats work group, report.	Enacted - <b>Chapter 41</b>
HB 932 Del. Marcus Simon	General Assembly; recodification of Title 30, effective clause for certain enactments	Enacted* - <b>Chapter 972</b>

\*Chapter 972 is subject to a reenactment clause. Clause 11 states: "11. That the first through seventh and ninth enactments shall not become effective unless reenacted by the 2027 Session of the General Assembly."

In addition, Clause 10 states: "10. That the Virginia Code Commission shall convene a work group with the Clerk of the House of Delegates and the Clerk of the Senate of Virginia, or their designees, to resolve remaining concerns with the Title 30 recodification. The work group shall complete its meeting by September 1, 2026."

## **Form Suggestions and Commentary**

### Executive Summary

Aggregated from twelve responses

Alphabetical by original term, suggestions below

- Adjudication:
  - The legal process of deciding a matter
- Affidavit
  - A written statement someone signs under oath
- Arraignment
  - The first court appearance where charges are formally read
- Arrears
  - money owed that should have been paid
- Arrearages
  - an amount of money that is owed and should have been paid earlier.
- Bill of Particulars
  - Order to provide claim details
  - request for more details from person who filed suit
  - Detailed Statement of Claim
- Burden of proof
  - The responsibility to prove something in court
- Capias
  - Court Order to Arrest
  - Order to Arrest
  - Order to take into custody
- Continuance
  - When a hearing or trial is postponed to another date
- Defendant / Respondent
  - The person being sued, charged, or responding to a petition
- Demurrer
  - Request to dismiss based on filings
  - Request for judgement on the pleadings
    - Motion to Dismiss For Failure to State a Claim
- Detinue
  - Claim for personal property
  - Claim for Return/Value of Personal Property
- Disposition
  - The final outcome or result of a case or hearing
- Due process
  - The right to fair legal procedures

- Evidence
  - Documents, testimony, or other proof presented in court
- Ex parte
  - without notice to the other side
  - without presence or notification of the other party
  - proceeding without presence or notification of the other party
- Execution creditor
  - creditor who has obtained a judgment
    - Judgement Creditor
- Fieri Facias
  - Order to seize goods or personal property
- File-stamped / entered
  - Officially filed by the clerk's office
- Foreign Protective Order
  - Protective Order issued by another state
- Garnishee
  - notice to provide money to satisfy a judgment
  - notice to pay money to satisfy a judgment
  - 3<sup>rd</sup> party holder of Judgment Debtor's Assets
- Grounds of defense
  - request for more details from person sued
- Guardian ad litem
  - attorney appointed to represent the best interests of a child or incapacitated person during a legal proceeding.
- In camera
- In loco parentis
- Interrogatories
  - Questions you must answer
- Jurisdiction
  - The legal authority of a court to hear a case
- Motion
  - A formal request asking the court to do something
- Motion craving oyer
  - motion to include essential documents
- Motion to Amend
  - Request to change an order
- Motion Craving Oyer
  - Motion to provide documents
- Nolo contender
  - not contest

- Nolle prosequi
  - The prosecutor decides not to move forward with the charge
  - not prosecute
- Order
  - A judge's written decision or direction
- Pendente lite
- Petitioner / Plaintiff
  - The person who initiates a legal case
- Pleading
  - Formal written papers filed in a case
- Prima Facie
- Pro se
  - without a lawyer
  - self-represented
  - represent yourself
- Relief
  - What a party is asking the court to grant
- Remand
  - Sending a case back to a lower court for more action
- Respondent
- Return date
  - date to appear if you wish to be heard
  - Next Court Date
  - date by which you must take action or return to court
- Rule to Show cause
  - order to appear and explain your actions
  - order to appear in court to give reasons why you should not be jailed or fined
  - Order to appear in court for possible contempt
- Service / served
  - Officially delivering legal papers to another party
- Subpoena duces tecum
  - order to produce documents, records, or tangible items
- Summons
  - Official notice that a case has been filed and action is required
- Summons for Unlawful Detainer
  - Summons for Unlawful Possession (or Occupancy) of Rental Property
- Tenant's assertion
  - Tenant's claim against landlord
- Testimony

- What a witness says under oath
- Unlawful detainer
  - Claim for eviction
- Vacate
  - To cancel or set aside a court order or judgment
- Venue
  - The proper court location where a case should be heard
- Warrant in Debt
  - Claim for Money Owed
  - Claim for money
- Warrant in distress
  - order allowing creditor to seize property
  - Order to seize property
- Without prejudice
  - Can be filed again later
- With prejudice
  - Cannot be filed again
- Writ of execution
  - order to enforce judgment

## **Form Suggestions and Commentary**

Alphabetical by Contributor

Emphasis from original preserved when practical

### **Hon. Lee Chitwood**

#### **Pulaski J&DR Court**

1. Capias-Court Order to Arrest
2. Ex parte-without notice to the other side
3. Pro se-without a lawyer
4. Rule to Show cause-order to appear and explain your actions

### **Hon. Mary Daniel**

#### **Frederick/Winchester General District Court**

Please notice how much more user friendly the WV Magistrate Court forms are. I practiced there for 20+ years and found it to be much more user-friendly to average citizens than Virginia is.

[Court Forms - Magistrate Court Forms | West Virginia Judiciary](#)

### **Paul DeLosh**

#### **Office of the Executive Secretary**

1. Adjudication: The legal process of deciding a matter
2. Affidavit: A written statement someone signs under oath
3. Arraignment: The first court appearance where charges are formally read
4. Arrearages: an amount of money that is owed and should have been paid earlier.
5. Burden of proof: The responsibility to prove something in court
6. Continuance: When a hearing or trial is postponed to another date
7. Defendant / Respondent: The person being sued, charged, or responding to a petition
8. Disposition: The final outcome or result of a case or hearing
9. Due process: The right to fair legal procedures
10. Evidence: Documents, testimony, or other proof presented in court
11. File-stamped / entered: Officially filed by the clerk's office
12. Foreign Protective Order: Protective Order issued by another state
13. Guardian ad litem: attorney appointed to represent the best interests of a child or incapacitated person during a legal proceeding.
14. Jurisdiction: The legal authority of a court to hear a case
15. Motion: A formal request asking the court to do something

16. Motion to Amend: Request to change an order
17. Nolle prosequi: The prosecutor decides not to move forward with the charge
18. Order: A judge's written decision or direction
19. Petitioner / Plaintiff: The person who initiates a legal case
20. Pleading: Formal written papers filed in a case
21. Relief: What a party is asking the court to grant
22. Remand: Sending a case back to a lower court for more action
23. Service / served: Officially delivering legal papers to another party
24. Summons: Official notice that a case has been filed and action is required
25. Testimony: What a witness says under oath
26. Vacate: To cancel or set aside a court order or judgment
27. Venue: The proper court location where a case should be heard
28. Without prejudice: Can be filed again later
29. With prejudice: Cannot be filed again

**Hon. Louise Harrison**  
**Bedford J&DR Court**

1. DC-329 The recognizance. What is wrong with saying "you are ordered to appear." I promise my wife all sorts of things. Thank God she can't throw me in jail. How do I find someone in contempt of a court order when there is no court order? A promise ? Why does it waive homestead? Am I really waiving anything when I am being forced to sign? I have had a dozen people ask me where they were supposed to pay the money set forth on the recognizance. The legalese and verbosity have been elevated to an art form on this one.
2. DC-360 The Show Cause. I can suspend a jail sentence, but for how long?
3. DC-314 The warrant contains a stay of proceedings pursuant to 16.1-131.1. In seventeen years, I have never used that box. If the matter had ever come up, I would write a memo to the circuit court detailing the issue. There are no boxes for consecutive or concurrent, which I use every other time.
4. DC-553 Disposition order. This is the single worst form in the OES system. I have written on this one more than once. If you want my diatribe again, I will be glad to state it again. There are boxes that should never be checked in any circumstances. Seasoned DSS attorneys and many judges don't know how to fill out some of the form. There is no place for concurrent goals, even though this is a best practice. Items are arbitrarily left out. The DC 555, Review Hearing and DC 557, Permanency Planning orders also need work, but the 553 is by far the worst. I have all my complaints in detail if you want them.

Bonus suggestion: A bonus suggestion. I don't like the advisement forms. They should be consolidated. I attach my suggestion. Thanks for your great work.

**Hon. Matthew Haynes**  
**Northampton General District Court**

I humbly suggest keeping the current form titles and adding a parenthetical to describe its purpose in plain language.

For Example: Warrant in Debt (Claim for Money Owed).

Demurrer: Request to dismiss based on filings

Garnishee: notice to provide money to satisfy a judgment

Return date: date to appear if you wish to be heard

Subpoena duces tecum: order to produce documents, records, or tangible items

Warrant in debt: Claim for money

**Hon. Daniel R. Lahne**  
**Virginia Beach General District Court**

**Bill of Particulars (Order to provide claim details)**

Capias: Order to take into custody

**Capias (Order to Arrest)**

Demurrer: Request for judgment on the pleadings

**Motion to Dismiss For Failure to State a Claim**

*Note that we rarely see a demurrer in general district court. I can count on one hand the number of times and there was counsel on both sides.*

Detinue: claim for personal property

*OES form already titled* **Warrant in Detinue (Civil Claim for Specific Personal Property)**

Execution creditor: creditor who has obtained a judgment

**Judgment creditor**

Execution debtor: debtor against whom judgment will be enforced

**Judgment debtor**

Ex parte: without presence or notification of the other party

Fieri facias: order to seize goods of debtor

**Fieri Facias (Order to seize goods or personal property)**

Garnishee: notice to pay money to satisfy a judgment

*This should not be garnishee (who is a party) but garnishment.*

*OES form should be titled* **Garnishment Summons (Order to withhold funds of debtor)**

Interrogatories: questions you must answer

OES form should be titled **Summons to Answer Interrogatories (Questions you must answer)**

*Note that discovery in general district court is limited and there is no provision for interrogatories and requests for production or admissions.*

Motion craving over: motion to include essential documents

*This is a motion to produce the document sued upon. Not a motion to provide documents important to the case, which would be more like the circuit court request for production of documents. We rarely see this motion in general district court. In 14 years I have only seen it once and there were attorneys on both sides.*

Pro se: self-represented

*If on forms, should read **Self represented party***

Return date: date by which you must take action

*The return date is the court date or next court date. I would simply replace the term with*

**Next Court Date**

Rule to show cause: order to appear in court and give reasons

**Order to Appear**

Subpoena duces tecum: order to produce documents, records, or evidence

**Order to produce documents, records or things**

Tenant's assertion: Tenant's claim against landlord

*The OES form is titled "Tenant's Assertion and Complaint"*

*I would simply change it to **Tenant's Complaint Against Landlord***

Unlawful detainer: Claim for eviction

*The OES form is already titled **Summons for Unlawful Detainer (Civil Claim for Eviction)***

Warrant in debt: Claim for money owed

*OES for is already titled **Warrant in Debt (Civil Claim for Money)***

Warrant in distress: order allowing creditor to seize property

**Order to seize property**

Writ of execution: order to enforce judgment

**Hon. Tanya Lomax**

**Chesapeake General District Court**

*Bill of particulars: request for more details from person who filed suit*

*Grounds of defense: request for more details from person sued*

*Capias: Order to arrest*

*Ex parte: proceeding without presence or notification of the other party*

*Pro se: represent yourself*

*Return date: date by which you must take action or return to court*

*Rule to show cause: order to appear in court to give reasons why you should not be jailed or fined.*

**Hon. Suzan Moore**  
**Bristol General District Court**

I have consulted with our Clerk, and are [sic] comments are that the forms are relatively self-explanatory, and members of the public are adept at finding what they need by searching with a few key word searches.

**Judge Mathew Paulk**  
**Richmond City General District Court**

Summons for Unlawful Detainer should be Summons for Unlawful Possession (or Occupancy) of Rental Property

**Hon. Areshini Pather**  
**Albemarle/Charlottesville J&DR Court**

- In loco parentis
- Pendente lite
- In camera
- Affidavit
- Prima facie
- Petitioner/ Respondent
- Commonwealth/ Defendant

**Hon. Turkessa Rollins**  
**Prince William General District Court**

My suggestions for terms are as follows:

1. Bill of particulars: **Detailed Statement of Claim**
2. Detinue: **Claim for Return/Value of Personal Property**
3. Garnishee: **3<sup>rd</sup> party holder of Judgment Debtor's Assets**
4. Motion Craving Oyer: **Motion to provide documents**
5. Return Date: **Court Date**
6. Rule to Show Cause: **Order to appear in court for possible contempt**

Some additional observations for Forms:

7. Unlawful Detainer- need a place to distinguish Tenants from Occupants (so that Judgment is clear as to who is responsible for monies)
8. Summons to Answer Interrogatories: need a place for Judge's to sign, as well as a place/box for Dismissal

**Hon. Lyn Simmons**  
**Norfolk J&DR Court**

The effort to remove Latin terms and legalese from documents in favor of plain language is long overdue, especially in the Juvenile and Domestic Relations Court and the General District Court. Many of the litigants we serve proceed pro se. Removing these terms will make the courts more user friendly, removing intimidation or discomfort that might confuse citizens or prevent them from having meaningful involvement in litigation. The terms listed in the attachment accompanying the letter from the Chief Justice is an excellent start to that end.

I would add the following terms:

Nolle prosequi/Nolle prose: not prosecute

Nolo contendere: not contest

Arrears: money owed that should have been paid



May 22, 2026

The Honorable Marcus B. Simon  
Chair, Virginia Code Commission  
General Assembly Building, Room 1114  
201 North 9th Street  
Richmond, Virginia 23219  
[delmsimon@house.virginia.gov](mailto:delmsimon@house.virginia.gov)

Re: Request to recodify Title 24.2, Elections

Dear Chair Simon:

VEBA respectfully requests that the Virginia Code Commission consider recodification of Title 24.2, Elections.

The last comprehensive recodification of Virginia's election laws occurred in 1993. In its report, the Virginia Code Commission explained, "Most of the changes have been piecemeal," and that recodification provided "the opportunity to review provisions in the context of the whole title -- a process not feasible during the regular legislative sessions." <sup>1</sup>

Since that recodification more than three decades ago, Title 24.2 has been amended substantially and election administration has become more sophisticated through the use of electronic pollbooks, expanded absentee and early voting, revised ballot processing, and other modern advancements.

This concern was recognized by the General Registrar and Electoral Board Workgroup in 2015, which recommended that Virginia, "Amend archaic sections of §24.2 to reflect the reality of current office practices. Even better would be recodification of the entire chapter." <sup>2</sup>

In 2016, the Workgroup again emphasized, "The Workgroup previously recognized the need for recodification of §24.2 and recommended it to the State Board of Elections, which unanimously accepted the recommendation." <sup>3</sup>

In 2017, the Commission approved Title 24.2 for future recodification work following completion of other projects and anticipated redistricting demands. <sup>4</sup>

In 2022, materials again noted, "In 2017, the Commission approved Title 24.2 (Elections) for recodification beginning in the 2022 interim..." while factors related to redistricting and campaign finance reform created further delays, but nevertheless stated, "Title 24.2 will be the next title to be recodified..." <sup>5</sup>

Earlier this year, during a meeting of the State Board of Elections, the Chair noted that Title 24.2 has yet to be reviewed by the Code Commission.<sup>6</sup>

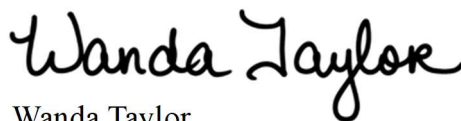
VEBA recognizes that recodification would require substantial coordination with the Department of Elections, local election officials, guidance materials, forms, and election calendars. For that reason, VEBA believes this work should proceed deliberately with careful planning and stakeholder review.

Accordingly, VEBA respectfully requests that the Virginia Code Commission consider recodification of Title 24.2 for incorporation into the Commission's workplan.

The impetus for recodification is now, just as it was in 1993, "a clearer, more easily understood set of election laws and the elimination of ambiguities in the present law rather than substantive changes in the law."<sup>1</sup>

Thank you for your consideration.

Sincerely,



Wanda Taylor  
VEBA President

WT;lwp

*The Virginia Electoral Board Association (VEBA) is a voluntary association of the 133 independent electoral boards across the Commonwealth of Virginia representing more than 6.2 million registered voters. Learn more at [www.vebanews.org](http://www.vebanews.org).*

---

<sup>1</sup> 1993 Recodification Report (SD25), p. 3:  
[rga.lis.virginia.gov/Published/1993/SD25/PDF](http://rga.lis.virginia.gov/Published/1993/SD25/PDF)

<sup>2</sup> 2015 GREB Interim Report, p.29:  
[elections.virginia.gov/media/boardpapers/grebworkgroup/FinalReportPostMeetwithAttach12112015.pdf](http://elections.virginia.gov/media/boardpapers/grebworkgroup/FinalReportPostMeetwithAttach12112015.pdf)

<sup>3</sup> 2016 GREB Report, pp. 6, 13:  
[elections.virginia.gov/media/boardpapers/grebworkgroup/2016GREBReportFinalHIGHLIGHTED.pdf](http://elections.virginia.gov/media/boardpapers/grebworkgroup/2016GREBReportFinalHIGHLIGHTED.pdf)

<sup>4</sup> Code Commission Minutes – June 26, 2017, p. 1:  
[codecommission.dls.virginia.gov/documents/2017/2017-06-26-minutes.pdf](http://codecommission.dls.virginia.gov/documents/2017/2017-06-26-minutes.pdf)

<sup>5</sup> Code Commission Meeting Materials – May 16, 2022, p. 23:  
[codecommission.dls.virginia.gov/May%202016-2022%20Meeting%20materials%20updated.pdf](http://codecommission.dls.virginia.gov/May%202016-2022%20Meeting%20materials%20updated.pdf)

<sup>6</sup> State Board of Elections Meeting – April 8, 2026, [2:17:00]:  
[youtu.be/BAw-8vuMykU?si=NJz0W1jeAg2h7ldG&t=8220](https://youtu.be/BAw-8vuMykU?si=NJz0W1jeAg2h7ldG&t=8220)

cc:

Amigo Wade, Director  
Division of Legislative Services  
General Assembly Building  
201 North 9th Street, 4th Floor  
Richmond, Virginia 23219  
[awade@dls.virginia.gov](mailto:awade@dls.virginia.gov)

The Honorable Marcia S. "Cia" Price  
Chair, House Privileges and Elections  
General Assembly Building, Room 911  
201 North 9th Street  
Richmond, Virginia 23219  
[delmprice@house.virginia.gov](mailto:delmprice@house.virginia.gov)

Steven Koski, Commissioner  
Virginia Department of Elections  
Washington Building  
1100 Bank Street, First Floor  
Richmond, Virginia 23219  
[steve.koski@elections.virginia.gov](mailto:steve.koski@elections.virginia.gov)

Holly Trice, Registrar of Regulations  
Virginia Code Commission  
General Assembly Building  
201 North 9th Street, 4th Floor  
Richmond, Virginia 23219  
[htrice@dls.virginia.gov](mailto:htrice@dls.virginia.gov)

The Honorable Aaron R. Rouse  
Chair, Senate Privileges and Elections  
General Assembly Building, Room 519  
201 North 9th Street  
Richmond, Virginia 23219  
[senatorrouse@senate.virginia.gov](mailto:senatorrouse@senate.virginia.gov)