

HOUSE BILL 231¹: CRIMES AND OFFENSES; VICTIMS OF STALKING; EXPAND
APPLICABILITY OF PROTECTIVE ORDERS

First signature: Representative Houston Gaines (117th)

Co-Sponsors: Representative Mandi Ballinger (23rd), Representative Bee Nguyen (89th), Representative Marcus Wiedower (119th), Representative Spencer Frye (118th), Representative Bonnie Rich (97th), and Senator Brian Strickland (17th)

Summary: "A BILL to be entitled an Act to amend Article 7 of Chapter 5 of Title 16 and Article 1 of Chapter 13 of Title 19 of the Official Code of Georgia Annotated, relating to stalking and granting of relief by superior courts, respectively, so as to expand the applicability of protective orders involving victims of stalking; to revise the definition of family violence to include certain acts between persons through whom a past or present pregnancy has developed or persons in a past or present dating relationship for the granting of protective orders and other relief; to provide for definitions; to require the court to make certain findings prior to granting protective orders alleging dating relationships; to provide for related matters; to repeal conflicting laws; and for other purposes."²

Status: Effective as of July 1, 2021.³

TEXT OF HOUSE BILL 231⁴

SECTION 1.

Article 7 of Chapter 5 of Title 16 of the Official Code of Georgia Annotated, relating to stalking, is amended by revising subsection (e) of Code Section 16-5-94, relating to restraining orders and protective orders, as follows:

¹H.B. 231, 156th Gen. Assemb., 2nd Reg. Sess. (Ga. 2021), *available at* <https://www.legis.ga.gov/api/legislation/document/20212022/199993> (last visited Oct. 2, 2022).

² *2021-2022 Regular Session-HB 231, Crimes and offenses; victims of stalking; expand applicability of protective orders*, GA. GEN. ASSEMB., *available at* <https://www.legis.ga.gov/legislation/59195> (last visited Oct. 2, 2022) [hereinafter H.B. 231 Status Sheet].

³*Id.*

⁴ H.B. 231, *supra* note 1.

“(e) The provisions of subsections (c), ~~and (d)~~, and (e) of Code Section 19-13-3, subsections (b), (c), and (d) of Code section 19-13-4, and Code Section 19-13-5, relating to family violence petitions, shall apply to petitions filed pursuant to this Code section, except that the clerk of court may provide forms for petitions and pleadings to persons alleging conduct constituting stalking and to any other person designated by the superior court pursuant to this Code section as authorized to advise persons alleging conduct constituting stalking on filling out and filing such petitions and pleadings.”

SECTION 2.

Title 19 of the Official Code of Georgia Annotated, relating to domestic relations, is amended by adding a new chapter to read as follows:

CHAPTER 13A

19-13A-1.

As used in this chapter, the term:

(1) ‘Dating relationship’ means a committed romantic relationship characterized by a level of intimacy that is not associated with mere friendship or between persons in an ordinary business, social, or educational context; provided, however, that such term shall not require sexual involvement.

(2) ‘Dating violence’ means the occurrence of one or more of the following acts between persons through whom a current pregnancy has developed or persons currently, or within the last six months, were, in a dating relationship:

(A) Any felony; or

(B) Commission of the offenses of simple battery, battery, simple assault, or stalking.

19-13A-2.

(a) Except for proceedings involving a nonresident respondent, the superior court of the county where the respondent resides shall have jurisdiction over all proceedings under this chapter.

(b) For proceedings under this chapter involving a nonresident respondent, the superior

court where the petitioner resides or the superior court where an act or injury involving dating violence allegedly occurred shall have jurisdiction, where the act or injury involving dating violence meets the elements for personal jurisdiction provided for under paragraph (2) or (3) of Code Section 9-10-91.

19-13A-3.

(a) Upon the filing of a verified petition in which the petitioner alleges with specific facts that probable cause exists to establish that dating violence has occurred in the past and may occur in the future, the court may order such temporary relief ex parte as it deems necessary to protect the petitioner from dating violence. If the court issues an ex parte order, a copy of the order shall be immediately furnished to the petitioner and such order shall remain in effect until the court issues an order dismissing such order to a hearing as set forth in subsection (b) of this Code section occurs, whichever occurs first.

(b) Within ten days of the filing of the petition under this chapter or as soon as practical thereafter, but not later than 30 days after the filing of the petition, a hearing shall be held at which the petitioner must prove the allegations of the petition by a preponderance of the evidence as in other civil cases. In the event a hearing cannot be scheduled within the county where the case is pending within the 30 day period, the same shall be scheduled and heard within any other county of that circuit. If a hearing is not held within 30 days of the filing of the petition, the petition shall stand dismissed unless the parties otherwise agree.

(c) Social service agency staff members designated by the court may explain to all petitioners not represented by counsel the procedures for filling out and filing all forms and pleadings necessary for the presentation of their petition to the court. The clerk of the court may provide forms for petitions and pleadings to petitioners and to any other person designated by the superior court pursuant to this Code section as authorized to advise petitioners on filling out and filing such petitions and pleadings. The clerk shall not be required to provide assistance to persons in completing such forms or in presenting their case to the court. Any assistance provided pursuant to this Code section shall be performed without cost to the petitioners. The performance of such assistance shall not constitute the practice of law as defined in Code Section 15-19-51.

(d) If the court finds a party is avoiding service to delay a hearing, the court may delay dismissal of the petition for an additional 30 days.

19-13A-4.

(a)(1) In order to determine if a protective order alleging dating violence shall be granted, the court shall provide findings of fact establishing that:

(A) There is a committed romantic relationship between the parties that is not associated with mere friendship or ordinary business, social, or educational fraternization;

(B) Factors exist which corroborate the dating relationship;

(C) The parties developed interpersonal bonding above a mere casual fraternization;

(D) The length of the relationship between the parties is indicative of a dating relationship;

(E) The nature and frequency of the parties interactions, including communications, indicate the parties intended to be in a dating relationship;

(F) The parties by statement or conduct demonstrated an affirmation of their relationship to others; or

(G) Both parties have acknowledged the dating relationship.

(2) Nothing in this chapter shall be construed as preventing the filing or granting of a protective order otherwise provided for under law for persons who reside together.

(b) The court may, upon the filing of a verified petition and as provided in subsection (a) of this Code section, grant any protective order or approve any consent agreement to bring about a cessation of acts of dating violence. The court shall not have authority to issue or approve mutual protective orders concerning paragraph (1), (3), or (5) of this subsection, or any combination thereof, unless the respondent has filed a verified petition as a counter petition pursuant to Code Section 19-13A-3 no later than three days prior to the hearing and the provisions of Code Section 19-13A-3 have been satisfied. The orders or agreements may:

(1) Direct the respondent to refrain from such acts;

(2) Provide for possession of personal property of the parties;

(3) Order the respondent to refrain from harassing or interfering with the petitioner;

(4) Award costs and attorney's fees to either party; and

(5) Order the respondent to receive appropriate psychiatric, psychological, or educational

services as a further measure to prevent the recurrence of dating violence.

(c) A copy of the order shall be issued by the clerk of the superior court to the sheriff of the county wherein the order was entered and shall be retained by the sheriff as long as that order shall remain in effect.

(d) Any order granted under this Code section shall remain in effect for up to one year; provided, however, that upon the motion of a petitioner and notice to the respondent and after a hearing, the court in its discretion may convert a temporary order granted under this Code section to an order effective for not more than three years or to a permanent order.

(e) A protective order issued pursuant to this Code section shall apply and shall be effective throughout this state. It shall be the duty of every superior court and of every sheriff, every deputy sheriff, and every state, county, or municipal law enforcement officer within this state to enforce and carry out the terms of any valid protective order issued by any court under the provisions of this Code section.

19-13A-5.

The remedies provided by this chapter are not exclusive but are additional to any other remedies provided by law.

19-13A-6.

A violation of an order issued pursuant to this chapter may be punished by an action for contempt or criminally punished as provided in Article 7 of Chapter 5 of Title 16.” _____

SECTION 3.

All laws and parts of laws in conflict with this Act are repealed.

SPONSOR’S RATIONALE

Representative Houston Gaines filed House Bill 231 in order to “address a deficit in Georgia law currently where victims of dating violence are not protected in these situations.”⁵ Before the introduction and subsequent passage of House Bill 231, Georgia was one of three states that _____

⁵ Georgia House of Representatives, *Judiciary Non Civil 03.04.21*, YOUTUBE (Mar. 4, 2021), https://www.youtube.com/watch?v=3eLkEqD_wnU&list=PLIgKJe7_xdLV_T8UkoYPYE mdWjOBYZDEq&index=217 (beginning at 3:15).

offered no civil recourse to victims of dating violence.⁶ Previously, Georgia law's definition of family violence was limited to victims who were married to, shared a child, or lived with their abuser.⁷ As a result, victims in a dating relationship were unable to seek a protective order.⁸ Representative Gaines believes "[t]emporary protective orders are crucial tools for victims who are seeking to break away from the cycle of abuse.⁹ Current law denies access to this potentially life-saving relief, so I am proud that House Bill 231 has been sent to the governor to be signed into law."¹⁰

House Bill 231 defines a dating relationship as "a committed romantic relationship characterized by a level of intimacy that is not associated with mere friendship or between persons in an ordinary business, social, or educational context; provided, however, that such term shall not require sexual involvement."¹¹ House Bill 231 covers those in a dating relationship or through which a pregnancy has developed and defines dating violence as the occurrence of any felony, simple battery, aggravated battery, aggravated assault, or stalking.¹² Factors indicative of such a dating relationship must be corroborated and not based merely upon the victim's testimony that such a relationship existed.¹³ This level of judicial review is necessary to curb potential abuse by those who merely claim to have been in a romantic relationship with their abuser.¹⁴ Once an individual alleges with specific facts that probable cause exists to establish the violence has occurred and may occur again, a court may order temporary relief *ex parte*, which advocates agree can be crucial in dating violence situations because it provides the victims some protection before a full hearing can be held.¹⁵

Introduction of House Bill 231 was due in part to concerns from local advocacy groups who stressed the prevalence of dating violence in Georgia, hoping to close the gap in existing law.¹⁶ Jamie Bormann, Deputy

⁶ Telephone Interview with Houston Gaines, Rep. 117th District (Sept. 28, 2022) [hereinafter *Gaines Interview*].

⁷ O.C.G.A. § 19-13-1 (2020).

⁸ O.C.G.A. § 19-13-4 (2020).

⁹ Gaines Interview, *supra* note 6.

¹⁰ *State Rep. Houston Gaines' Legislation to Support Victims of Dating Violence Receives Final Passage, Heads to the Governor's Desk* ALLONGEORGIA (Apr. 6, 2021), <https://allongeorgia.com/georgia-state-politics/state-rep-houston-gaines-legislation-to-support-victims-of-dating-violence-receives-final-passage-heads-to-the-governors-desk/>. [hereinafter *Gaines Legislation*].

¹¹ H.B. 231, *supra* note 1.

¹² *Id.*

¹³ *Judiciary Non Civil 03.04.21*, *supra* note 5 (at 51:40).

¹⁴ *Id.*

¹⁵ *Id.*

Director of Crisis Line and Safe House of Central Georgia, described how “[d]evastating it is for survivors” of dating violence relationships “[t]o hear that these remedies are not available to them.”¹⁷ Existing Georgia stalking laws allowed for potential relief to victims in dating relationships, but only if they could prove a pattern of the behavior.¹⁸ Rebecca Grist, Solicitor General of Macon-Bibb County, explained how the existing stalking statute is not the appropriate avenue for granting dating violence relief, given the amount of judicial discretion, and believes that “you have to establish that repeated pattern of behavior [for judges because] they see it as a surveillance type of thing...[That] is how they are interpreting it, and that’s why some of these victims are falling through the cracks.”¹⁹ According to Joan Prittie,²⁰ “[a] victim of domestic violence is...fifteen hundred times more likely to be killed when the abusive partner has threatened that person with death...[I]n the context of an abusive relationship, threats matter...[I]f we wait for the physical punch, it’s too long.”²¹ House Bill 231 provides a clearer and separate method of relief for victims who had previously not fit into a category required by statute.²²

Fulton County Judge Alex Manning told the House Sub-Committee of the drastic increase in domestic violence cases on her docket, a total of one thousand since March of 2020.²³ She said that because dating partners do not fall within the Family Violence Act, victims are left with only the stalking statute for relief.²⁴ If the behavior does not qualify as stalking, she had to turn these victims away, emphasizing that “[t]his is a hole that needs to be plugged for people who are dating.”²⁵ Judge Manning described her personal struggle when hearing domestic violence cases where she could offer no legal remedy under Georgia law.²⁶ She described how in the last year alone, at least four victims who did not qualify for a protective order under the existing law lost their lives at the hands of their abuser.²⁷ “Sitting in D[omestic] V[iolence] court and getting a call a week or two later or

¹⁶ Georgia House of Representatives, *Judiciary Non Civil Reeves Subcommittee 02.08.21*, YOUTUBE (Feb. 8, 2021), <https://tinyurl.com/mr35u9fc> (beginning at 1:28:17).

¹⁷ *Id.*

¹⁸ O.C.G.A. §16-5-94(c) (2021).

¹⁹ *Judiciary Non Civil Reeves Subcommittee 02.08.21*, *supra* note 16 (beginning at 1:46).

²⁰ *Judiciary Non Civil 03.04.21*, *supra* note 5 (beginning at 19:20).

²¹ Joan Prittie and Nancy Hunter, *Georgia Domestic Violence Benchbook* (15th Ed.), <https://icje.law.uga.edu/wp-content/uploads/2022/02/15thDVBB.pdf>.

²² *Judiciary Non Civil Reeves Subcommittee 02.08.21*, *supra* note 16 (beginning at 1:39:00).

²³ *Judiciary Non Civil Reeves Committee 02.08.21*, *supra* note 16 (beginning at 2:05:15).

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

hearing it on the news, and seeing that someone was in front of me and I dismissed the case...[has caused me to lose] a lot of sleep in the last year or so.”²⁸

In addition to providing a civil remedy for victims of dating violence who choose not to press criminal charges, House Bill 231 also seeks to alter the cyclical nature of interpersonal violence.²⁹ Victims often return to their abuser after only a short period of time, having been lured in by apologies and promises to change violent behavior.³⁰ As such, the time period immediately following a violent act can be crucial in stopping this pattern.³¹ The Bill does not stop at ordering a respondent from refraining from violence or otherwise contacting or harassing the victim.³² In addition, the respondent may also be ordered to receive psychiatric, psychological, or educational services in an effort to prevent the recurrence of dating violence.³³ The added protection of a court order prevents contact between the victim and abuser.³⁴ Without a protective order, parties are more likely to reconcile after an incident, only to repeat the pattern.³⁵ The intent of House Bill 231 is to discourage this cycle for those in a dating relationship.³⁶

OPPOSITION’S RATIONALE

House Bill 231 passed unanimously.³⁷ However, skeptics at the committee and sub-committee level were confused as to the definition of “dating relationship.”³⁸ In a society where such relationships often quickly emerge through social media platforms, some legislators argued for a clearer distinction.³⁹ Sub-committee members raised questions regarding what circumstances and duration of time might define a dating relationship.⁴⁰ While the Bill’s language articulates that a couple must agree

²⁸ *Id.*

²⁹ *Judiciary Non Civil 03.04.21*, *supra* note 5 (beginning at 11:01).

³⁰ *Id.* (beginning at 10:48).

³¹ *Id.*

³² Claudia Kelly-Bazan, *Bipartisan Bill Would Add Protections for Dating Violence Victims in Georgia*, FOX FIVE ATLANTA (Apr. 8, 2021), <https://www.fox5atlanta.com/news/bipartisan-bill-would-add-protections-for-dating-violence-victims-in-georgia>.

³³ *Judiciary Non Civil 03.04.21*, *supra* note 5 (beginning at 33:42).

³⁴ *Id.*

³⁵ *Id.*

³⁶ *Id.*

³⁷ *Id.*

³⁸ *Judiciary Non Civil 03.04.21*, *supra* note 5 (beginning at 6:00).

³⁹ *Id.*

⁴⁰ *Id.*

that theirs' was a "committed, romantic relationship," some opponents questioned the word "committed," particularly when one partner considers themselves to be committed, while the other may be seeing multiple people at once.⁴¹ Of major concern was that such a broad definition could lead to false accusations and abuse of the new law.⁴² If two people went on only one date that ended in a violent incident, would that one social occasion rise to the level of a dating relationship?⁴³ Ultimately, House Bill 231, gives the judge discretion to examine corroborating evidence in determining whether a romantic relationship existed.⁴⁴

Opposers questioned why the dating relationship distinction was necessary when the existing Georgia stalking law allowed for protection regardless of the parties' domestic status.⁴⁵ They argued that acts of violence could be categorized as "harassing and intimidating behavior."⁴⁶ However, whether those statutes were construed in such a way has been traditionally left to judicial discretion, leading to inconsistent and unpredictable results.⁴⁷

Despite the Bill's unanimous passage, a lingering concern is that such legislation might lend support to special interest groups wishing to pass "Red Flag" laws.⁴⁸ Georgia is one of several states currently without such a law, which would allow a judge to suspend a person's access to guns if they are deemed to be a threat against themselves or others.⁴⁹ A 2008

⁴¹ *Id.*

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Judiciary Non Civil 03.04.21, supra* note 5 (beginning at 51:30).

⁴⁵ O.C.G.A. § 16-5-90 (sets out the crime of stalking and states that a person will be convicted when he or she follows, places under surveillance, or contacts another person at or about a place or places without the consent of the other person for the purpose of harassing and intimidating the other person).

⁴⁶ *Judiciary Non Civil Reeves Committee 02.08.21, supra* note 16 (beginning at 2:09:19).

⁴⁷ *Id.*

⁴⁸ Telephone Interview with Spencer Frye, Rep. 118th District (Sept. 28, 2022) [hereinafter *Frye Interview*]. See Amber Phillips, *What are red-flag laws?*, WASHINGTON POST (Jun. 14, 2022, 6:00AM), <https://www.washingtonpost.com/politics/2022/06/14/what-is-a-red-flag-law/>. ("Red-flag laws allow police, family members or even doctors to petition a court to take away someone's firearms for up to a year if they feel that person is a threat to themselves or others." *Id.*). See also Carolina Diez et al., *State Intimate Partner Violence-Related Firearm Laws and Intimate Partner Homicide Rates in the United States, 1991 to 2015*, 167 ANNALS INTERNAL MED. 536 app. tbl. 2 (2017). ("State laws that prohibit persons subject to IPV-related restraining orders from possessing firearms and also require them to relinquish firearms in their possession were associated with 9.7% lower total IPH rates ... and 14.0% lower firearm-related IPH rates ... than in states without these laws." *Id.*).

study across 47 states revealed that mandated restriction to firearms pursuant to a temporary protective order greatly reduced family homicide rates.⁵⁰ By extending protective orders to dating violence situations, those who support Red Flag law legislation may have more leverage.⁵¹ Conversely, those who oppose Red Flag laws assert that because temporary protective orders are issued *ex parte*, restricted access to guns would violate the accused's Due Process rights.⁵² Proponents of such laws assert that they are a step in the direction of curbing domestic violence.⁵³ In fact, some argue that where there is a finding of domestic violence, it must be accompanied by a surrender of weapons.⁵⁴ Though House Bill 231 was crafted to have no impact on a respondent's right to lawfully carry guns under the Second Amendment, it nonetheless remains a concern that Georgia may be one step closer to adopting Red Flag laws.⁵⁵

IMPLICATIONS IN GEORGIA

Since the passage of House Bill 231, judges no longer face a gap in Georgia law which would previously bar them from granting a protective order to a victim of dating violence⁵⁶. Georgia now joins an overwhelming majority of states who recognize the need to meet the needs of an evolving culture.⁵⁷ Representative Spencer Frye recalled a recent phone conversation with a dating violence survivor who said, “[t]hank you for passing this bill because I am still alive to make this phone call.”⁵⁸ Where Judge Manning previously lamented that the law provided no avenue by which judges could grant protective orders unless a couple was married, cohabitating, or had a child, House Bill 231 gives judges the tools to help curb dating violence.⁵⁹ Previously, Georgia residents suffering abuse at the hands of their dating partners were disappointed to learn they could not obtain a protective order, and were left to live in fear of further abuse.⁶⁰ Now, they have the recourse

⁴⁹ Leah Asmelash, *Indiana's 'red flag' law should have prevented the FedEx shooting. Here's what else you should know about these laws*, CNN (Apr. 21, 2021, 4:02PM), <https://www.cnn.com/2021/04/21/us/red-flag-laws-explainer-trnd/index.html>.

⁵⁰ Prittie, *supra* note 21 at E:2.

⁵¹ Frye Interview, *supra* note 48.

⁵² Prittie, *supra* note 21 at E:2.

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ Frye Interview, *supra* note 48.

⁵⁶ *Judiciary Non Civil Reeves Committee 02.08.21*, *supra* note 25.

⁵⁷ *Id.*

⁵⁸ Frye Interview, *supra* note 48.

⁵⁹ *Id.*

necessary to mitigate that fear.⁶¹

The Bill became effective on July 1, 2021. It expands the language of O.C.G.A. §16-5-7 and Title 19 regarding stalking and interpersonal violence and the applicability of protective orders to victims of abuse by current or former dating partners.⁶² In drafting the Bill, its sponsors used laws from 47 other states to construct language that would best suit Georgians.⁶³ The legislators understood that not all romantic relationships are sexual in nature.⁶⁴ While the Bill requires the victim to prove that a certain level of intimacy exists or recently existed, there is no requirement of a sexual component.⁶⁵ Representative Gaines emphasized how states who have implemented legislation similar to H. B. 231 “have seen an eleven percent reduction on the total rate of intimate partner homicide.”⁶⁶ Further, he believes that “[a]s one of three states that does not offer civil protection for victims of dating violence, this legislation marks a significant step forward in our fight against domestic violence.”⁶⁷

As originally enacted, House Bill 231 extended only to couples who were currently in a dating relationship or were in a dating relationship within the previous six months.⁶⁸ This posed a problem for many who might have ended their relationships just outside of those parameters but were still in fear of their former partner. After a conversation with a survivor who had escaped abuse eight months prior, Representative Gaines concluded that the law should extend further.⁶⁹ As a result, he sought to amend House Bill 231 with House Bill 1452, which passed in May 2022.⁷⁰ Under this amendment, victims of dating violence may now seek a protective order against an abusive partner with whom they were in a relationship in the previous twelve months.⁷¹

⁶⁰ Maya T. Prabhu, *Georgia Legislature Invests in Support of Victims of Stalking, Domestic Violence* AJC (Apr. 15, 2021), <https://www.ajc.com/politics/georgia-legislature-invests-in-support-of-victims-of-stalking-domestic-violence/3QEKVM5LDVGTBBO7MWUHRAI6JI/>.

⁶¹ *Id.*

⁶² H.B. 231, *supra* note 1.

⁶³ *Judiciary Non Civil 03.04.21*, *supra* note 5 (beginning at 26:36).

⁶⁴ *Judiciary Non Civil Reeves Committee 02.08.21*, *supra* note 16 (beginning at 1:35:10).

⁶⁵ *Id.*

⁶⁶ *Id.* (beginning at 1:29:30).

⁶⁷ Gaines Legislation, *supra* note 10.

⁶⁸ Gaines Interview, *supra* note 6.

⁶⁹ *Id.*

⁷⁰ H.B. 1452, 156th Gen. Assemb., 1st. Reg. Session (Ga. 2022), available at <https://www.legis.ga.gov/legislation/62372> (last visited Nov. 7, 2022).

⁷¹ *Id.*

LEGISLATIVE GENEALOGY

House Bill 231 was entered into the House Hopper on February 1, 2021.⁷² The House first readers were on February 2, 2021.⁷³ The House Second Readers were on February 3, 2021.⁷⁴ On March 5, 2021 the House Committee Favorably Reported By Substitute.⁷⁵ The House Third Readers were on March 8, 2021, and the House Passed/Adopted by Substitute on the same date.⁷⁶ The Senate Read and Referred on March 9, 2021.⁷⁷ On March 25, 2021, the Senate Committee Favorably Reported by Substitute and also Read the Second Time.⁷⁸ The Senate Tabled the bill on March 29, 2021, on which date it was Taken from the Table, had the Senate Third Read, and was Passed/Adopted by the Substitute.⁷⁹ On March 31, 2021 the House agreed Senate Amend or Sub.⁸⁰ On April 7, 2021, the House sent it to the Governor as Act 273.⁸¹ House Bill 231 became effective on July 1, 2021.⁸²

Prepared by: *Lindsey N. Roberts*

⁷² H.B. 231 Status Sheet, *supra* note 2.

⁷³ *Id.*

⁷⁴ *Id.*

⁷⁵ *Id.*

⁷⁶ *Id.*

⁷⁷ *Id.*

⁷⁸ H.B. 231 Status Sheet, *supra* note 2.

⁷⁹ *Id.*

⁸⁰ *Id.*

⁸¹ *Id.*

⁸² *Id.*