

9-1-1989

## PENAL INSTITUTIONS Prisons and Pardons/ Paroles Reform

S. Taylor

Follow this and additional works at: <https://readingroom.law.gsu.edu/gsulr>

 Part of the [Law Commons](#)

---

### Recommended Citation

S. Taylor, *PENAL INSTITUTIONS Prisons and Pardons/Paroles Reform*, 6 GA. ST. U. L. REV. (1989).

Available at: <https://readingroom.law.gsu.edu/gsulr/vol6/iss1/36>

This Peach Sheet is brought to you for free and open access by the Publications at Reading Room. It has been accepted for inclusion in Georgia State University Law Review by an authorized editor of Reading Room. For more information, please contact [mbutler@gsu.edu](mailto:mbutler@gsu.edu).

## PENAL INSTITUTIONS

### *Prisons and Pardons/Paroles Reform*

CODE SECTIONS:	O.C.G.A. §§ 15-21-90 to -95 (new), 17-10-9.1 (new), 42-2-14 (new), 42-3-6 (amended), 42-8-34.1 (new), 42-8-36 (amended), 42-8-72 (amended)
BILL NUMBERS:	HB 94, HB 466, HB 499, HB 616, SB 26, SB 67, SB 257
ACT NUMBERS:	540, 483, 27, 431, 691, 394, 418
SUMMARY:	The new legislation establishes alternatives to incarceration which may be considered by the sentencing judge, increases reporting responsibilities of probationers, modifies procedures for jail construction, increases fines to fund jail construction, establishes bond forfeiture procedures, and institutes a program which allows judges to release prisoners on their own recognizance or on bail prior to incarceration.
EFFECTIVE DATE:	July 1, 1989

### *History*

The 1989 Georgia General Assembly entered the session faced with a prison population that was rapidly outgrowing the capacity of the prison system.<sup>1</sup> The General Assembly was particularly concerned with the need to build new prisons, with the need for potential sources of funding for new prisons, and with what to do with prisoners housed in excess of the system capacity while awaiting appropriations and construction of the new prison facilities. Seven bills which address reform measures in the prisons and pardons/paroles areas were enacted in the 1989 session.<sup>2</sup> Eight related bills were also introduced but failed

---

1. When the 1989 session began, the prison population exceeded 18,000 prisoners, which was 43% above capacity. In addition, approximately 3800 prisoners were awaiting transfer from county detention facilities to state facilities. O'Shea, *Assembly Making Prisons a Priority*, Atlanta J. & Const., Jan. 21, 1989, at C1, col. 6.

2. The seven prisons and pardons/paroles reform measures which passed both houses and were signed into law are HB 94, HB 466, HB 499, HB 616, SB 26, SB 67, and SB 257.

to pass both houses.<sup>3</sup> A sixteenth bill was passed by both houses but was vetoed by the Governor.<sup>4</sup>

### *HB 94*

HB 94 changes the requirements for the revocation of modified or suspended sentences by allowing courts to consider alternatives to confinement when sentencing pursuant to a probation revocation.<sup>5</sup> The previous section mandated that in the event of a violation of probation or suspension "other than by commission of a new felony offense,"<sup>6</sup> the court could not revoke more than six months of the probation or suspension, and this time was to be served in one of several specified facilities.<sup>7</sup> Removal of technical revocations from the law meant that for less than the commission of a new felony, individuals who violated provisions of a probated or suspended sentence could not be returned to prison for such a violation.<sup>8</sup>

The new section requires judges to consider the use of alternatives to confinement including "community service, intensive probation, diversion centers, probation detention centers, [and] special alternative incarceration . . ." <sup>9</sup> If the sentencing judge determines that an individual does not meet the criteria to warrant imposition of one of these alternatives, however, "the court may revoke the balance of [the individual's] probation," or may impose "not more than two years in confinement, whichever is less."<sup>10</sup> The second provision of the Act requires that an individual offender not be placed on probation or parole for more than a total of four years "for any one offense or series of offenses arising out of the same transaction . . ." <sup>11</sup> The previous section created some uncertainty regarding whether the four year limitation on probation or parole was a "lifetime cap."<sup>12</sup> Therefore, language was added to clarify that the "cap" applies not to the individual offender, but to each offense committed by that individual.<sup>13</sup>

---

3. The bills which failed to pass both houses were SB 280, SB 367, HR 18, HR 25, SR 37, SR 57, SR 65, and SR 96.

4. The bill which passed both houses but was vetoed by the Governor was HB 576.

5. O.C.G.A. § 42-8-34.1(b) (1989).

6. 1988 Ga. Laws 1911.

7. *Id.*

8. Telephone interview with Representative Philip A. Foster, House District No. 6 (Apr. 26, 1989) [hereinafter Foster Interview].

9. O.C.G.A. § 42-8-34.1(b) (1989).

10. *Id.*

11. O.C.G.A. § 42-8-34.1(e) (1989).

12. Foster Interview, *supra* note 8.

13. *Id.*

*HB 466*

HB 466 received two floor amendments and one committee amendment before being passed by both houses.<sup>14</sup> The Act adds a new section which authorizes the sentencing judge to release a convicted individual on bond or on the convict's own recognizance pending the defendant's voluntary surrender to a designated facility at a fixed future date.<sup>15</sup>

The Act's first subsection allows the release of such a defendant by the sentencing judge except when the individual has been convicted of, and is being sentenced for, certain enumerated offenses.<sup>16</sup> The second subsection provides that an individual who has been released on bond may be considered for the program as well, but that the sentencing judge has sole and final discretion as to a defendant's eligibility.<sup>17</sup> The defendant has no right of appeal from the judge's decision.<sup>18</sup>

The third subsection reemphasizes that the sentencing judge has final authority, and lists some criteria which the judge may consider in deciding whether an individual may be allowed to participate in the

14. Final Composite Status Sheet, Mar. 15, 1989.

15. O.C.G.A. § 17-10-9.1 (Supp. 1989).

16. O.C.G.A. § 17-10-9.1(a) (Supp. 1989). The offenses excluded from the provisions of this Act are:

- (1) Treason;
- (2) Murder;
- (3) Rape;
- (4) Aggravated sodomy;
- (5) Armed robbery;
- (6) Aircraft hijacking;
- (7) Aggravated child molestation;
- (8) Manufacturing, distributing, delivering, dispensing, administering, selling, or possessing with intent to distribute any controlled substance classified under Code Section 16-23-26 as Schedule I or under Code Section 16-13-26 as Schedule II;
- (9) Violating Code Section 16-13-31, relating to trafficking in cocaine or marijuana;
- (10) Kidnapping, arson, or burglary if the person, at the time the person was charged, has previously been convicted of, was on probation or parole with respect to, or was on bail for kidnapping, arson, aggravated assault, burglary, or one or more of the offenses listed in paragraphs (1) through (9) of this subsection;
- (11) Child molestation;
- (12) Robbery;
- (13) Aggravated assault; or
- (14) Manslaughter.

*Id.* The Act further provides that this section does not apply to individuals convicted of a capital felony. O.C.G.A. § 17-10-9.1(e) (Supp. 1989).

17. O.C.G.A. § 17-10-9.1(b) (Supp. 1989).

18. *Id.*

program.<sup>19</sup> The sentence of a defendant who is released under this program will not begin to run until he surrenders to the designated facility at the designated time.<sup>20</sup>

If a defendant is ordered to report to a county jail, the court will designate the reporting date.<sup>21</sup> When a defendant is ordered to report to a correctional institution, the Department of Corrections shall designate the reporting date and the institution to which the defendant is to report.<sup>22</sup> In either case, the reporting date shall not be more than 120 days after the date of conviction, and the defendant is responsible for the costs incurred in traveling to the designated facility.<sup>23</sup>

The Act further provides<sup>24</sup> that a defendant's failure to report at the time and place designated for voluntary surrender may result in the defendant's being charged with bail jumping,<sup>25</sup> escape,<sup>26</sup> or cited for contempt of court.<sup>27</sup> Finally, the Act provides that "[t]he Department of Corrections is authorized and directed to promulgate such rules and regulations as may be necessary to effectuate the purposes of this Code section."<sup>28</sup>

### HB 499

HB 499 was also enacted specifically to address prison overcrowding problems.<sup>29</sup> The Act establishes a new section which provides that when the population of the state prison system has exceeded capacity for a period of ninety consecutive days, the Governor may declare a state of emergency.<sup>30</sup> Upon such declaration, the Act authorizes the Department of Corrections to establish additional permanent or temporary facilities as it deems appropriate.<sup>31</sup>

---

19. O.C.G.A. § 17-10-9.1(c) (Supp. 1989). The judge may consider the crime for which the defendant was convicted, the defendant's history, and "any other factors which may aid in the decision . . ." *Id.* The judge must determine that the defendant, if allowed to participate in the program, "pose[s] no threat to society." *Id.*

20. *Id.* See O.C.G.A. § 17-10-11 (1982).

21. O.C.G.A. § 17-10-9.1(d) (Supp. 1989).

22. *Id.*

23. *Id.*

24. O.C.G.A. § 17-10-9.1(f) (Supp. 1989).

25. See O.C.G.A. § 16-10-51(a) (1986).

26. See O.C.G.A. § 16-10-52(a)(3) (1986).

27. See O.C.G.A. § 15-6-8(5) (1986).

28. O.C.G.A. § 17-10-9.1(g) (Supp. 1989).

29. Foster Interview, *supra* note 8.

30. O.C.G.A. § 42-2-14 (1989). The Act provides that such a declaration may be made by the Governor "upon certification by the commissioner of corrections and approval by the director of the Office of Planning and Budget that the population of the prison system . . . has exceeded the capacity of the prison system . . ." *Id.*

31. *Id.*

The Department is permitted to purchase or lease new or existing facilities to meet its needs.<sup>32</sup> The Act further provides that in order to accomplish this task, the Department may waive certain provisions of the Code which are ordinarily required when expending funds for such purposes.<sup>33</sup> This seemingly liberal discretion in waiving procedural safeguards in state purchasing was believed necessary because under the current system, once funding of a new prison has been approved, the plans remain on the drawing board for about twelve months.<sup>34</sup> The entire prison construction process takes anywhere from thirty-six to forty-eight months after the funding is approved.<sup>35</sup>

After passage of the bill, some legislators expressed concern over the bypassing of these procedural safeguards, in particular the competitive bidding process.<sup>36</sup> Other legislators argued, however, that the competitive bidding process in Georgia is not necessarily of benefit as it is currently implemented.<sup>37</sup> The Act mandates that if statutorily required safeguards are bypassed, the Department of Corrections shall file a detailed report with the Governor and the General Assembly, explaining the reasons for the construction, the requirements which were waived, and the reasons for the waiver of requirements.<sup>38</sup>

32. *Id.*

33. *Id.* While noting that the bonding provisions must still be complied with, the Act specifically waives requirements under O.C.G.A. §§ 42-3-1 to -32 (1989) (Georgia Building Authority (Penal)), O.C.G.A. §§ 50-5-1 to -186 (1986 & Supp. 1989) (Department of Administrative Services), and O.C.G.A. §§ 50-22-1 to -9 (1986 & Supp. 1989) (Managerial Control Over Acquisition of Professional Services). *Id.* These provisions are waived in order to facilitate rapid construction or procurement of correctional facilities in emergency situations. *Id.*

34. Foster Interview, *supra* note 8. Representative Foster noted that other states have "generic" prison plans on file which allow those states to go to bid quickly once funding for a new prison has been authorized. *Id.*

35. *Id.*

36. Hill & May, *Senate Regrets It OK'd Bill to Waive Competitive Bids on Prison Contracts*, Atlanta J., Mar. 14, 1989, at E3, col. 1. Individual senators expressed concern about the bill, particularly in light of the announcement by Governor Harris of his intention to institute an inmate release program. *Id.* Senator Albert Scott stated: "Now there's no longer a crisis. I think [the bill] is just bad government. Period." *Id.* Senator Paul Coverdell expressed concern over elimination of the competitive bidding requirement. *Id.*

37. Foster Interview, *supra* note 8. Representative Foster explained that prisons built under the current competitive bidding system "take years to get into shape" after completion. *Id.* Representative Foster also noted that the Governor's release program was just a stop-gap measure and would not provide any permanent relief. *Id.* See also Beasley, *40% Return Rate Predicted for Early Release Program*, Atlanta Const., Mar. 24, 1989, at B1, col. 2 (citing Department of Corrections statistic that 40.7% of early release inmates are returned to prison within two years).

38. O.C.G.A. § 42-2-14 (1989). Representative Foster explained that this Act, and this part of the Act in particular, places a large measure of accountability on all of those involved with new prison construction to ensure that reasonable costs are maintained.

Finally, this Act is not intended to be applicable to the construction of maximum security facilities.<sup>39</sup> This Act is intended to allow for construction of facilities classified as medium or lesser security, as well as to allow for the use of high security modular trailers for the housing of inmates.<sup>40</sup>

### HB 616

HB 616 amends existing section 42-8-36 to provide for additional circumstances under which the running of a probated sentence will be suspended.<sup>41</sup> The first subsection of the old Code remains virtually unchanged. This amended section of the Act provides that the probationer is required to keep the probation supervisor informed as to the probationer's residence, and if the court believes it to be necessary, the probationer will also be required to keep the supervisor informed of the individual's whereabouts.<sup>42</sup> Failure of the probationer to comply with these requirements, return of a warrant for *non est inventus* or other return of a warrant for violation of probation, or inability of the probation supervisor to find the probationer in the county which is the probationer's county of record, will automatically suspend the running of the probated sentence.<sup>43</sup> The suspension will continue until such time as the probationer personally reports to the supervisor, is taken into custody, or is made available to the court.<sup>44</sup> The effective tolling date of the sentence is the date of return of the warrant by any officer authorized to issue or serve warrants.<sup>45</sup>

The new subsection created by the Act tolls the probated sentence period by the submission of an affidavit by the probation officer that the probationer has left the jurisdiction and cannot be found.<sup>46</sup> This provision places the burden upon the probationer to remain in contact

---

Noting that the current construction cost per prison bedspace is approximately \$40,000, Foster stated, "If we exceed that under the provisions of this bill, we should be taken out and hung." Foster Interview, *supra* note 8.

39. Foster Interview, *supra* note 8.

40. *Id.* Under the "Fast Track" construction program authorized on April 17, 1989, the Department of Corrections began construction on permanent detention facilities rather than modular trailer type units. *Id.* A total of eight 200 bed facilities will be open by mid-November 1989, at an average construction time of four months per facility, and an average cost of \$10,000 per bedspace. *Id.* The total number of bedspaces funded, approved, constructed, and occupied during the 1989 calendar year will exceed 2400. *Id.*

41. O.C.G.A. § 42-8-36(a) (1989).

42. O.C.G.A. § 42-8-36(a)(1) (1989).

43. O.C.G.A. § 42-8-36(a) (1989). *Non est inventus* is defined as, "The sheriff's return to process requiring him to arrest the body of the defendant, when the latter is not found within his jurisdiction." BLACK'S LAW DICTIONARY 950 (5th ed. 1979).

44. O.C.G.A. § 42-8-36(a)(2) (1989).

45. O.C.G.A. § 42-8-36(a)(1) (1989).

46. O.C.G.A. § 42-8-36(a)(2) (1989).

with the probation supervisor, and alleviates the burden on the sheriff to file a *non est inventus* report in order to toll the sentence.<sup>47</sup>

The Act eliminates the possibility that the probationer would simply leave the jurisdiction for the duration of the probated sentence. Under the old section, if a warrant had not been returned for *non est inventus* during the period of the probationer's absence, the sentence never stopped running, so the probation period could have expired before the probationer returned. Under the new section, the probation supervisor's affidavit that the probationer cannot be found is sufficient to toll the probation period. This provision allows the court to retain some measure of authority over a probationer who has left the jurisdiction for a period of time.<sup>48</sup>

### SB 26

SB 26 enacted a new Article 5 to Chapter 21 of Title 15 of the Code,<sup>49</sup> to be known as the "Jail Construction and Staffing Act."<sup>50</sup> The Article was enacted pursuant to a provision in the Georgia Constitution<sup>51</sup> which authorizes additional assessments in criminal cases, traffic cases, and "cases involving violations of ordinances of political subdivisions . . ."<sup>52</sup> The constitutional provision further provides that proceeds from such additional assessments "may be used for constructing, operating, and staffing of . . . correctional facilities by counties."<sup>53</sup>

The Act provides that before any additional penalties which are authorized by the other provisions in the Article may be collected by a county, the county must adopt a resolution placing the Article in effect.<sup>54</sup> The Act further provides that municipalities may not impose any additional fines authorized by the Article "unless the municipality and county enter into an intergovernmental contract after January 1, 1990, providing for use of the county jail, correctional institution, or detention facility by municipal prisoners."<sup>55</sup>

The Act's third section provides for an additional ten percent penalty which may be imposed by a court in any county or municipality in which the Act is in effect.<sup>56</sup> The ten percent penalty is computed based upon the amount of the original fine.<sup>57</sup> The same section also provides

---

47. Foster Interview, *supra* note 8.

48. *Id.*

49. O.C.G.A. § 15-21-90 (Supp. 1989).

50. O.C.G.A. §§ 15-21-90 to -95 (Supp. 1989).

51. O.C.G.A. § 15-21-91 (Supp. 1989). *See* GA. CONST. art. III, § 9, ¶ 6.

52. O.C.G.A. § 15-21-91 (Supp. 1989).

53. GA. CONST. art. III, § 9, (¶) 6.

54. O.C.G.A. § 15-21-92 (Supp. 1989).

55. *Id.*

56. O.C.G.A. § 15-21-93(a)(1) (Supp. 1989).

57. *Id.*



that at the time bail is posted in any case involving violation of a criminal or traffic law, an additional "[ten] percent of the original amount of bail or bond shall be posted."<sup>58</sup> If forfeiture of the bail or bond is ordered, the additional ten percent amount is to be paid over to the clerk or court officer charged with collecting such fees.<sup>59</sup> The Act also notes that the sums authorized by the Act are in addition to those authorized by O.C.G.A. § 47-17-60 for the Peace Officers' Annuity and Benefit Fund or O.C.G.A. § 47-11-51 for the Judges of the Probate Courts Retirement Fund of Georgia.<sup>60</sup>

The Act's fourth section provides that funds are to be "collected by the clerk or court officer charged with the duty of collecting moneys arising from fines and forfeited bonds,"<sup>61</sup> and "shall be paid . . . to the governing authority of the county" which shall deposit the funds "into a special account known as the 'county jail fund.'"<sup>62</sup> Any individual who has this duty and fails to remit the funds as required will be guilty of a misdemeanor.<sup>63</sup>

Finally, the Act provides that the funds collected pursuant to the Act are to be expended solely for "constructing, operating, and staffing county jails, county correctional institutions, and detention facilities"<sup>64</sup> or to contract "for such facilities with other counties, the state, municipalities or other political subdivisions as authorized" by the constitution.<sup>65</sup> The funds may also be pledged as security for construction bonds issued to construct such correctional facilities.<sup>66</sup> The Article does not prohibit the appropriation or expenditure of other funds for use on jail construction projects.<sup>67</sup>

The sponsor of the measure stated simply that the bill "[is] a way of making those who use the criminal justice system . . . pay for the construction and staffing of those facilities."<sup>68</sup> The sponsor estimated that such additional levies in DeKalb County alone would provide enough funds to pay the annual debt service on a nine million dollar jail.<sup>69</sup>

58. O.C.G.A. § 15-21-93(a)(2) (Supp. 1989).

59. O.C.G.A. § 15-21-94(a) (Supp. 1989).

60. O.C.G.A. § 15-21-93(b) (Supp. 1989).

61. O.C.G.A. § 15-21-94(a) (Supp. 1989).

62. *Id.*

63. O.C.G.A. § 15-21-94(b) (Supp. 1989).

64. O.C.G.A. § 15-21-95 (Supp. 1989).

65. *Id.*

66. *Id.*

67. *Id.*

68. *Secrest, Bill Would Provide Funds to Build New Jails, Atlanta Const., Feb. 6, 1989, at A7, col. 3* (quoting the sponsor of the bill, Senator Roy Barnes).

69. *Id.*

*SB 67*

SB 67 amends O.C.G.A. § 42-8-72 by adding two new subsections regarding community service as a condition of probation.<sup>70</sup> The first new subsection allows a judge to “order an offender to perform community service hours in a 40 hour per week work detail in lieu of incarceration.”<sup>71</sup> The second new subsection permits a judge to add community service hours to the original court ordered hours as a disciplinary measure against the offender “or as an additional requirement of any program in lieu of incarceration.”<sup>72</sup>

*SB 257*

SB 257 was originally introduced as an amendment to the Code section regarding the Georgia Correctional Industries Administration. The bill's purpose was to “change . . . powers of the . . . [a]dministration . . . with regard to capital projects [and] clarify . . . powers” of the administration with respect to earnings and vocational training of inmates.<sup>73</sup>

The House Committee on State Institutions offered a substitute to SB 257. The substitute included, in addition to the provisions in the original version of the bill, an amendment to O.C.G.A. § 42-3-6, which increased the amount of negotiable revenue bonds which may be issued by the Georgia Building Authority from twenty million dollars to one hundred million dollars.<sup>74</sup> This version of the bill was adopted and recommended by the conference committee,<sup>75</sup> and was adopted by both houses.<sup>76</sup> Section 1 amends the section dealing with revenue bonds issued by the Georgia Building Authority. O.C.G.A. § 42-3-6 remains unchanged except that the maximum dollar amount issuable for negotiable revenue bonds is now one hundred million dollars, an increase from twenty million dollars.<sup>77</sup>

Section 2 amends the section relating to the powers of the Georgia Correctional Industries Administration. The Act allows the Administration “[t]o retain its earnings for expenditure upon any lawful purpose of the administration,”<sup>78</sup> and “[t]o conduct vocational training of inmates without regard to their industrial or other assignment[s].”<sup>79</sup>

---

70. O.C.G.A. § 42-8-72(d)–(e) (1989).

71. O.C.G.A. § 42-8-72(d) (1989).

72. O.C.G.A. § 42-8-72(e) (1989).

73. SB 257, as introduced, 1989 Ga. Gen. Assem.

74. SB 257 (HCS), 1989 Ga. Gen. Assem.

75. SB 257 (CCS), 1989 Ga. Gen. Assem.

76. Final Composite Status Sheet, Mar. 15, 1989.

77. O.C.G.A. § 42-3-6 (1989).

78. O.C.G.A. § 42-10-4(6) (1989).

79. O.C.G.A. § 42-10-4(6.1) (1989).

The Act also allows the administration "[t]o construct, erect, install, equip, repair, replace, maintain, and operate facilities . . . consistent with its purposes."<sup>80</sup> However, the Department of Corrections is prohibited from transferring any capital outlay appropriations unless the appropriation is expressly designated by line item.<sup>81</sup> Finally, the Act provides that all facilities of the administration which are completed, and which were under construction at the time of the passage of the Act, are ratified and approved.<sup>82</sup>

### *Conclusion*

In addition to adopting legislation discussed in this article, the 1989 Georgia General Assembly appropriated forty-one million dollars for the fiscal year 1989 supplemental budget to add 3500 prison beds by 1991.<sup>83</sup> The fiscal year 1990 budget contains ninety-one million dollars for prison facilities.<sup>84</sup> The 1990 budget also provides funds for an increase in county jail and county work subsidy payments, funding for jobs and equipment for new detention centers, bond funds to complete a prison currently under construction and to complete phase II of another prison project, funds for continued AIDS testing of inmates, and bonds to renovate the Atlanta Advancement Center and add a women's unit to Gateway Diversion Center.<sup>85</sup>

The Governor also introduced his "intensive parole" program for the early release of nonviolent prisoners.<sup>86</sup> While the benefits of the program seem somewhat unclear,<sup>87</sup> it has produced some interesting side effects. Members of the Board of Pardons and Paroles have found themselves the objects of lobbying efforts by state lawmakers who wish to see certain individuals released under this program.<sup>88</sup> Such lobbying efforts by some legislators sparked angry reactions from other members of the General Assembly.<sup>89</sup>

Whatever the disagreements among the legislators, the 1989 General Assembly took positive steps to alleviate prison system overcrowding.

80. O.C.G.A. § 42-10-4(6.2) (1989).

81. *Id.*

82. *Id.*

83. O'Shea & Hill, *Panel Approves \$41 Million for Prisons*, Atlanta Const., Feb. 21, 1989, at A1, col. 1.

84. NEWS FROM THE GA. SENATE, FINAL REPORT, at 11, Mar. 28, 1989.

85. *Id.* at 11, 12.

86. *Id.* at 12.

87. See *supra* note 37 and accompanying text.

88. Beasley, *Lawmakers Ask Inmates' Early Parole*, Atlanta Const., Mar. 22, 1989, at A1, col. 5.

89. Beasley, *Kidd: Bar Petitions For Parole*, Atlanta Const., Mar. 23, 1989, at B1, col. 5.

1989]

LEGISLATIVE REVIEW

297

Though no group of interests was entirely satisfied by the progress made in this session, the measures taken may permit the Legislature to address other areas of concern in Georgia in the next session.

*S. Taylor*