

MEMORANDUM 2024-20

**Landlord and Tenant Terminology:
Terminology in Other States**

This memorandum¹ continues the Commission’s study of the establishment of consistent and appropriate terminology to describe parties to a residential real property rental agreement across all California codes, as directed by the Legislature.²

AB 2503³ directs the Commission to deliver to the Legislature, on or before December 31, 2024, a report evaluating whether it would be “prudent and practicable” for the Legislature to adopt a comprehensive statutory scheme that would simultaneously do both of the following:

- (1) Establish the use of consistent terminology across all California codes to describe parties to an agreement for the rental of residential real property.⁴
- (2) Preserve existing legal distinctions between the terms currently used to describe those parties.⁵

The study also directs the Commission to consider other related subjects, including terminology used for parties to a residential real property rental in the laws of other states.⁶

This memorandum presents the results of the staff’s research on terminology used in the laws of other states.

RESEARCH INTO TERMINOLOGY USED IN OTHER STATES

As indicated above, the legislation assigning this study to the Commission directs the Commission to consider terminology used in the laws of other states. The legislation declares “[t]here are currently a variety of terms used in the California codes used to

1. Any California Law Revision Commission document referred to in this memorandum can be obtained from the Commission. Recent materials can be downloaded from the Commission’s website (www.clrc.ca.gov). Other materials can be obtained by contacting the Commission’s staff, through the website or otherwise.

The Commission welcomes written comments at any time during its study process. Any comments received will be a part of the public record and may be considered at a public meeting. However, comments that are received less than five business days prior to a Commission meeting may be presented without staff analysis.

2. See 2022 Cal. Stat ch. 462 ([AB 2503](#)).

3. *Id.*

4. *Id.* § (1)(c)(1).

5. See *id.* § (1)(c)(1)(A).

6. See *id.* § (1)(c)(1)-(2).

describe parties to an agreement to rent residential real property....”⁷ and “[a] review of ...use of the terms ‘landlord’ and ‘tenant’ in the codes could help determine whether these terms remain relevant to modern residential housing law.”⁸ It then instructs the Commission to “deliver ... to the Legislature a study regarding [t]erminology used in the laws of other states.”⁹ The discussion below describes how the staff conducted that research and describes the staff’s findings.

Scope of Research

This memorandum reports on terminology used in the laws of other states to describe parties to a residential real property rental agreement. Given the impracticality of surveying all fifty states, the staff chose to focus on five: New York, Massachusetts, Illinois, Texas, and Florida. These states were chosen for their variety in population size¹⁰ and percentage of renters.¹¹

The staff understands the study’s directive to research the terminology used in other states’ laws to refer to statutory language, consistent with the Commission’s focus. In further seeking to comprehend how other states use the different terms for parties involved with residential real property rentals, the staff additionally examined official governmental publications explaining their state’s residential rental laws to the public to explore if there was a centralized effort to introduce or universalize other terminology.

Research Findings

This five-state survey yielded results similar to California’s terminology review in both breadth and confusion. The dominant terms were “landlord,” and “tenant,” followed by “lessee,” “lessor,” and “owner.” And, like California law, most states’ laws also generally failed to define these words, used inconsistent definitions across code sections when they did, and used the terms seemingly interchangeably, without an apparent distinction in meaning. Further, while each state had a primary location in their codes of residential real

7. *Id.* § (1)(a)(2).

8. *Id.* § (1)(a)(3).

9. *Id.* § (1)(c)(2).

10. <https://www.census.gov/data/tables/time-series/demo/popest/2020s-state-total.html#v2023>. California is the most populous state, followed by Texas, Florida, and New York. Illinois is sixth, and Massachusetts is 16th most populous.

11. <https://www.census.gov/housing/hvs/data/rates.html>. New York and California have the 48th and 49th lowest rates of homeownership respectively, at 54.2% and 55.3%. Massachusetts’ homeownership rate is 62.6%, Texas’ 64.2%, Florida’s 66.6%, and Illinois’ 69.6%. The nationwide homeownership rate is 65.7%. Press Release, United States Census Bureau, Quarterly Residential Vacancies and Homeownership, Fourth Quarter 2023 (January 30, 2024), available at <https://www.census.gov/housing/hvs/files/currenthvspress.pdf>.

property rental information, the statutes were spread throughout multiple codes.¹²

The states are presented in order of relative consistency of terms, from the state with the least consistent use of defined terms to the most. Details on the findings are described below.

New York

New York’s Attorney General publishes a Residential Tenant’s Rights Guide which summarizes practical residential real property law for the general public.¹³ Throughout this publication, the terms “landlord” and “tenant” are used predominantly,¹⁴ but are not defined.

The actual statutes, however, prove more varied in their verbiage. Residential real property law is spread primarily across six codes: Real Property Law, General Obligations Law, Real Property Actions and Proceedings Law, Multiple Dwellings Law, Multiple Residence Law, and Environmental Conservation Law.

New York’s Real Property Law is home to the bulk of sections establishing the legal rules for individuals renting and those providing housing. The following terms are used in this code without generally applicable definitions:¹⁵

- Landlord.¹⁶
- Chief landlord.¹⁷
- Owner.¹⁸
- Tenant.¹⁹
- Co-tenant.²⁰

12. Although each state used different words to describe the organizations of their statutes, staff is using California’s terminology. For example, California’s statutes are divided into different subjects by “code,” such as the Probate Code and Penal Code. New York, however, divides their subjects into “laws”, as in Personal Property Law and Real Property Law. Staff will use the term “code” for purposes of this memorandum.

13. Office of the New York State Attorney General, Residential Tenants’ Rights Guide: Renter’s Rights and Protections Under New York State Law, available at https://ag.ny.gov/sites/default/files/tenants_rights.pdf.

14. See *id.* “Landlord” is used 257 times and “tenant” 379 times. “Owner” appears 48 times and “lessor” only once, as a direct quote from a statute (“owners or lessors” page 33), and “lessee” not at all. “Subtenant” appears six times, though neither “sublessor” nor “sublessee” appear at all.

15. New York Real Property Law does define “manufactured home tenant,” “manufactured home owner,” and “manufactured home park owner or operator,” however. See N.Y. Real Prop. Law § 233 (a)(1-5). An unofficial version of New York Real Property Law can be found at The New York State Senate’s website, <https://www.nysenate.gov/legislation/laws/RPP>.

16. N.Y. Real Prop. Law §§ 220, 223-b, 224, 225, 226, 226-b, 226-c, 227-e, 227-f, 228, 229, 230, 231, 232, 232-a, 232-b, 232-c.

17. *Id.* § 226.

18. *Id.* §§ 223-b, 226-b, 227-a, 227-b, 227-c, 231.

19. *Id.* §§ 222, 223-b, 224, 225, 226-a-d, 227-e, 227-f, 228, 229, 230, 231, 232-a-c, 233, 233-a-b.

20. *Id.* § 227-c.

- Lessor.²¹
- Lessee.²²
- Sublessee.²³
- Holder of an under-lease.²⁴
- Occupant other than the owner of any building of premises.²⁵
- Person, firm, or corporation owning or managing any building used for dwelling purposes, or the agent of such person, firm or corporation.²⁶

Terminology is used interchangeably throughout the Real Property Law; sections frequently use the pairings “lessor or owner”²⁷, “lessee or occupant”²⁸, and “lessee or tenant.”²⁹ Unfortunately, none of these terms are defined. Nor are similar terms defined within General Obligations Law.³⁰

The staff did, however, identify a few definitions for the term “owner” in other New York codes relating to residential real property rentals. Two highly specialized code sections within Real Property Actions and Proceedings Law define “owner” broadly to include “assignee of rents, receiver, executor, trustee, lessee, agent, or any other person, firm, or corporation, directly or indirectly in control of a dwelling, but shall not include a receiver”³¹ Similarly, “owner” is also defined in several sections of New York’s Multiple Dwelling Law, Multiple Residence Law, and Environmental Conservation Law.³²

The staff’s research does not suggest, however, that the New York legislature has endeavored to avoid or eliminate the term “landlord” in the various laws. For instance, the Real Property Law sections referenced above that use the term “landlord” were revised

21. *Id.* §§ 223, 227-a, 227-b, 227-c.

22. *Id.* §§ 223, 226, 227, 227-a, 231.

23. *Id.* § 226-b.

24. *Id.* § 229.

25. *Id.* § 231.

26. *Id.* § 227-d.

27. E.g., see *id.* § 227-a.

28. *Id.* § 227.

29. *Id.* § 227-a.

30. N.Y. Gen. Oblig. Law §§ 5-905 and 7-105.

31. N.Y. Real Prop. Acts. Law § 781, “Special Proceedings by Tenants of Dwellings in the City of New York and the Counties of Nassau, Suffolk, Rockland and Westchester for Judgment Directing Deposit of Rents and the Use Thereof for the Purpose of Remedying Conditions Dangerous to Life, Health, or Safety” and *id.* § 796, “Special Proceedings by Tenants of Dwellings for Judgment Directing Deposit of Rents and the Use Thereof for the Purpose of Remedying Conditions Dangerous to Life, Health or Safety.”

32. E.g., see N.Y. Mult. Dwell. Law § 4(44) defining “owner” to mean “the owner or owners of the freehold of the premises or lesser estate therein, a mortgagee or vendee in possession, assignee of rents, receiver, executor, trustee, lessee, agent, or any other person, firm or corporation, directly or indirectly in control of a dwelling.” The definition further clarifies the meaning for purposes of public nuisance law to reach individuals organized through a corporation or other form, as specified.

multiple times through 2021 and no change was made to the use of that term.³³

Massachusetts

Massachusetts' Attorney General offers a website to explain basic residential real property renter rights.³⁴ The site uses the terms "landlord" and "tenant" almost exclusively, using the term "owner" only once in referencing a specific requirement that the person's name, address, and phone number be included in the lease.³⁵ The terms "landlord" and "tenant" are not defined.

Like New York, Massachusetts residential real property law is spread across multiple codes.³⁶ The bulk of the law is found in the Real and Personal Property and Domestic Relations code, Chapter 186, Estates for Years and at Will.³⁷ The chapter contains no universal definitions, however, and the following terms are used throughout:

- Tenants at sufferance.³⁸
- Landlord.³⁹
- Tenant.⁴⁰
- Owner.⁴¹
- Lessor.⁴²
- Occupant.⁴³
- Lessee.⁴⁴
- Co-tenant.⁴⁵
- Property owner.⁴⁶

33. For example, New York Real Property Law Section 231 was originally codified in 1909 and has been amended through 2016. "Landlord" is used in the first paragraph, and then the section switches to the term "owner" without explanation.

34. <https://www.mass.gov/guides/the-attorney-generals-guide-to-landlord-and-tenant-rights>.

35. *Id.* The website states "The lease must include the name, address, and phone number of the owner, the person responsible for maintenance, and the person to whom the tenant can give copies of formal notices, complaints, or court papers."

36. For example, references to residential real property concerns also appear in the following chapters of Massachusetts General Laws: 239, Summary Process for Possession of Land; 40, Evictions; 111, Public Health, and 166A, Community Antenna Television Systems. An unofficial version of Massachusetts General Laws may be found at the 193rd General Court of the Commonwealth of Massachusetts' website, <https://malegislature.gov/Laws/GeneralLaws>.

37. Mass. Gen. Laws Ann. ch. 186.

38. *Id.* § 3.

39. *Id.* §§ 7, 8, 11, 11A, 12, 13, 14, 15, 15B, 15F, 16-24, 31.

40. *Id.* §§ 3, 11, 11A, 12, 13, 13A, 15, 15A, 15B, 15E, 15F, 17-24, 26, 27, 29, 30, 31.

41. *Id.* §§ 13, 15E, 23, 24, 25, 26, 27, 29, 30.

42. *Id.* §§ 14, 15, 15B, 15C, 15D, 16, 19, 21, 30.

43. *Id.* §§ 14, 17, 21.

44. *Id.* §§ 15, 15A, 15B, 15C, 15D, 15E, 16.

45. *Id.* §§ 23, 24, 26, 27, 29.

46. *Id.* § 30.

Some code sections provide definitions with limited application. For example, “landlord” is defined for one section specific to water consumption.⁴⁷ And, the section immediately following defines the term “owner” for purposes of tenant domestic violence.⁴⁸

As with New York, the staff did not find that Massachusetts law has been consistently amended to eliminate or replace certain terms. For instance, one section, which was originally enacted in 1969, uses the terms “lessor,” “lessee,” “landlord,” and “tenant” with no accompanying definitions.⁴⁹ This section was amended several times through 2004 to gradually - but not completely - replace “landlord” with “lessor.”⁵⁰ In 2022, a new section was added to the same chapter that predominately uses the term “landlord.”⁵¹

Illinois

Illinois’ Attorney General also publishes a public guide to landlord and tenant laws. That guide uses the terms “landlord” and “tenant” exclusively throughout its three pages but are not defined.⁵²

As with New York and Massachusetts though, the terminology in the statutes is much more varied. Illinois’ residential real property laws are primarily, but not exclusively,⁵³ contained within the Property code⁵⁴. The following terms are used throughout:

- Landlord.⁵⁵

47. *Id.* § 22. “Landlord” is defined as “the owner, lessor or sublessor of a dwelling unit, the building of which it is a part, or the premises wherein a customer receives water service through metered measurement.”

48. *Id.* § 23. This section incorporates by reference a definition of “owner” from the state regulations (105 Mass. Code Regs. 410.010). “Owner” is defined as “every person who alone or severally with others: (1) Has legal title to any residence, or parcel of land, vacant or otherwise, including a manufactured housing community; (2) Has care, charge or control of any residence, or parcel of land, vacant or otherwise, including a manufactured housing community, in any capacity including, but not limited to, personal representative, agent, executor, executrix, administrator, administratrix, trustee or guardian of the estate of the holder of legal title; (3) is a mortgagee in possession of any such property; (4) Is an agent, trustee or other person appointed by the courts and vested with possession or control of any such property; or, (5) Is an officer or trustee of the association of unit owners of a condominium.”

49. Mass. Gen. Laws Ann. ch. 186, § 15B.

50. *Id.* See credits.

51. *Id.* § 31.

52. Office of the Illinois Attorney General, Landlord and Tenant Rights and Laws, *available at* <https://illinoisattorneygeneral.gov/Page-Attachments/LandlordAndTenantRightsLaws.pdf>.

53. As in California, however, laws related to residential rental property can be found throughout the state law, including for example, 5 Ill. Comp. Stat. Ann. 412/5-30, 310 Ill. Comp. Stat. Ann. 10/25, and 35 Ill. Comp. Stat. Ann. 200/22-15. An unofficial version of Illinois Compiled Statutes may be found at the Illinois General Assembly website, <https://www.ilga.gov/legislation/ilcs/ilcs.asp>.

54. 765 Ill. Comp. Stat. Ann. 5/0.01 - 1085/35.

55. 765 Ill. Comp. Stat. Ann. 705/0.01, 4, 15, 16, 20; 720/1; 735/1, 1.1, 1.2, 1.3, 1.4, 2, 2.1, 4, 5; 740/5; 742/5, 25; 750/10.

- Tenant.⁵⁶
- Lessor.⁵⁷
- Lessee.⁵⁸
- Occupant.⁵⁹
- Owner.⁶⁰
- Residential tenant.⁶¹
- Unit owner.⁶²

Although all the acts are within the same chapter, there does not appear to be a single set of definitions that applies throughout. Instead, terms are used interchangeably. Many sections within a single act use either the pairs “landlord and tenant”⁶³ or “lessor and lessee.”⁶⁴ However, several sections use the terms “lessor,” “owner,” and/or “landlord” within a single code section without clarifying the reason for the different words.⁶⁵ Other acts, such as the Mobile Home Landlord and Tenant Rights Act⁶⁶ and the Rental Property Utility Service Act are more self-contained, establishing definitions and using those terms consistently.⁶⁷ Interestingly, however, the Mobile Home Landlord and Tenant Rights Act does not use the term “landlord” in its actual text.⁶⁸ As in New York and Massachusetts, the staff did not find any indication of a more recent effort to use consistent terminology (i.e., the date of enactment or amendment did not reflect different term usage).⁶⁹

56. *Id.* 705/0.01, 4, 5, 16, 20; 720/1; 735/1, 1.1, 1.2, 1.3, 1.4, 2, 2.1, 2.2, 3, 4, 5; 740/5; 742/5, 15, 20, 30; 745/3, 4a, 6, 6.3, 6.4, 6.5, 6.6, 6.7, 7, 8, 8.5, 9, 9.5, 11, 12, 12a, 13, 14, 14-1, 15, 16, 18, 19, 21, 22, 23, 25; 750/10.

57. *Id.* 705/1, 10, 15; 710/1, 1.1; 715/1, 2; 730/2, 3, 5; 735/4, 5.

58. *Id.* 705/5, 10, 15; 710/1, 1.1, 1.2; 715/1, 2; 730/1, 2, 4, 5; 735/4.

59. *Id.* 705/5; 745/6.3, 6.6.

60. *Id.* 705/5, 15; 745/4a, 7, 9, 11.

61. *Id.* 735/2.1; 742/1.

62. *Id.* 740/5.

63. See, e.g., *id.* 705/4 and 720/1.

64. See, e.g., *id.* 705/10 and 710/1.1.

65. See, e.g., *id.* 705/5 and 705/15.

66. *Id.* 745/26.

67. *Id.* 735/1.1 (defining terms including “landlord” and “tenant” for the Rental Property and Utility Service Act).

68. The Act instead uses and defines the terms park owner, tenant, and managing agent. *Id.* 745/3 §§ 3 (d), (e), and (i).

69. Compare, e.g., *Id.* 730/, the Rent Concession Act, with *Id.* 735/, the Rental Property Utility Service Act. These Acts were both enacted the same year, 1925, and subsequently amended. One act uses the term “landlord,” while the other does not. See also *Id.* 710/1, which was enacted in 1974, amended in 2024, and uses the terms “lessor” and “lessee” exclusively, while *Id.* 705/20 was added in 2024 and uses only the terms “landlord” and “tenant.”

The Rent Concession Act was amended most recently in 1993 and does not use the term “landlord.” 765 Ill. Comp. Stat. Ann. 730/0.01 - 730/6. The Rental Property Utility Service Act was amended most recently in 2005 and does use that term. 765 Ill. Comp. Stat. Ann. 735/0.01 - 735/5.

Texas

The Texas Attorney General hosts a Renter’s Rights page on its website.⁷⁰ After using “renter” in the title, this resource uses only the terms “landlord” and “tenant” to describe parties to a residential real property contract, though these terms are not defined. “Landlord” and “tenant” are the dominant terms throughout the statutes, as well.

Statutes governing residential real property rentals appear across over 25 Texas codes, but primarily reside in two chapters of the Property Code, Chapter 91: Provisions Generally Applicable to Landlords and Tenants⁷¹ and Chapter 92: Residential Tenancies.⁷² The entire Property Code was redrafted in 1983 as part of Texas’ ongoing statutory revision program, which endeavors to make the law more accessible and understandable without substantive change.⁷³ As a result, Texas residential real property law is fairly well-organized and consistent.

The following terms are used, but not defined, in Provisions Generally Applicable to Landlords and Tenants chapter:

- Landlord.⁷⁴
- Tenant.⁷⁵
- Occupant.⁷⁶
- Fee owner.⁷⁷
- Intermediate lessor.⁷⁸

The Residential Tenancies chapter is organized into nine subchapters and establishes definitions that apply throughout (unless otherwise specified), including:

- “Landlord” means the owner, lessor, or sublessor of a dwelling, but does not include a manager or agent of the landlord unless the manager or agent purports to be the owner, lessor, or sublessor in an oral or written lease.⁷⁹
- “Tenant” means a person who is authorized by a lease to occupy a dwelling

70. <https://www.texasattorneygeneral.gov/consumer-protection/home-real-estate-and-travel/renters-rights>.

71. Tex. Prop. Code Ann. §§ 91.001 - 91.006. This chapter applies to Chapters 92-94, Residential, Commercial, and Manufactured Home Tenancies. An unofficial version of Texas Constitution and Statutes may be found at the Texas Capitol website, <https://statutes.capitol.texas.gov/>.

72. *Id.* §§ 92.001 - 92.355.

73. *Id.* § 1.001. Further information on this process can be found at Texas Legislative Counsel’s website at <https://tlc.texas.gov/code-projects>.

74. *Id.* §§ 91.001, 91.003, 91.004, 91.005, 91.006.

75. *Id.* §§ 91.001, 91.003, 91.004, 91.005.

76. *Id.* § 91.003. This is the only section the staff found that substantially departs from the use of “landlord” and “tenant” exclusively. This section was recodified in 1983 as part of the larger redrafting process and there are no historical or statutory notes in the annotations indicating why the divergent terms were preserved.

77. *Id.*

78. *Id.*

79. *Id.* § 92.001(2).

to the exclusion of others and, for the purposes of Subchapters D, E, and F, who is obligated under the lease to pay rent.⁸⁰

Within the chapter, there are definitions of “landlord” that differ somewhat from the chapterwide definition above but have a more limited application. For example, the subchapter relating to security devices defines “landlord” to mean a dwelling owner, lessor, sublessor, management company, or managing agent, including an on-site manager.⁸¹ The subchapter relating to rental applications clarifies that “landlord” means a *prospective* landlord.⁸² There is only the single definition, noted above, for “tenant.”

Florida

The Florida Department of Agriculture and Consumer Services, rather than the Attorney General, provides a summary of Landlord/Tenant Law on its website.⁸³ The terms “landlord” and “tenant” are used nearly exclusively, but are not defined.⁸⁴

Florida’s laws are much more consistent than the other states surveyed. This may be a result of its enactment of the Florida Residential Landlord and Tenant Act in 1973,⁸⁵ which comprehensively revised prior residential real property rental law for clarity and usefulness.⁸⁶

The Act’s provisions have since been updated and subsequent amendments remain consistent.⁸⁷ Statutes related to residential real property rentals are now located primarily in two codes,⁸⁸ and each adhere to the definitions established within each part.

From the Residential Landlord and Tenant Act:

- “Landlord” means the owner or lessor of a dwelling unit.⁸⁹

80. *Id.* § 92.001(6).

81. *Id.* § 92.151.

82. *Id.* § 92.351.

83. <https://www.fdacs.gov/Consumer-Resources/Landlord-Tenant-Law-in-Florida>.

84. *Id.* “Lessee” replaces “tenant” in one description of a landlord’s potential remedies.

85. Fla. Laws 1973, c.73-330 § 1.

86. R. Williams and P.B. Phillips, Jr., *The Florida Residential Landlord and Tenant Act*, 1 Fla. St. U. L. Rev. 555, 556 (1973), available at <https://ir.law.fsu.edu/cgi/viewcontent.cgi?article=1714&context=lr>. This article notes that Florida’s Residential Landlord and Tenant Act was based on the Uniform Law Commission’s original Uniform Residential Landlord and Tenant Act. “The purpose of the original act was to eliminate all elements of outmoded common law from the landlord-tenant relationship and base all phases of the rental agreement on contract law.” <https://www.uniformlaws.org/committees/community-home?communitykey=e9cd20a1-b939-4265-9f1e-3a47a538d495>.

87. See, e.g., Fla. Stat. § 83.43. This section was part of the original 1973 Act and has been amended seven times through 2023. An unofficial version of Florida statutes may be found at the state Legislature’s Online Sunshine site, <http://www.leg.state.fl.us/Statutes/index.cfm?Mode=View%20Statutes&Submenu=1&Tab=statutes>.

88. See also Fla. Stat. §§ 715.10 - 715.111, the Disposition of Personal Property Landlord and Tenant Act. Other codes, such as Public Health, also contain provisions related to the rental of residential real property. See, e.g., *id.* § 381.00895 related to “migrant labor camps” and “residential migrant housing.” The dominant term in this section is “owner or operator” and “resident.”

89. Fla. Stat. § 83.43(8).

- “Tenant” means any person entitled to occupy a dwelling unit under a rental agreement.⁹⁰

From the Disposition of Personal Property Landlord and Tenant Act:

- “Landlord” means any operator, keeper, lessor, or sublessor of furnished or unfurnished premises for rent, or her or his agent or successor-in-interest.⁹¹
- “Owner” means any person other than the landlord who has any right, title, or interest in personal property.⁹²
- “Tenant” includes any paying guest, lessee, or sublessee of any premises for rent, whether a dwelling unit or not.⁹³

The term “owner” in this Act refers not to the owner of the real property, but of personal property that was left behind at the premises after the tenant departed.”⁹⁴

CONCLUSION

The staff’s brief survey of other states’ laws indicates that California is not alone in using a patchwork of terms for the parties involved in residential real property rentals. New York, Illinois, and Massachusetts use similarly inconsistent terminology and rarely provide definitions for the different terms. Florida and Texas, however, undertook comprehensive revisions of their property statutes in the 1970s and 1980s, respectively. In those states’ laws, the terms “landlord” and “tenant” predominate.

This research will be incorporated into the Commission’s final report to the Legislature in this study.

Would the Commission like staff to do further research into other state’s laws?

Respectfully submitted,

Sarah Huchel
Staff Counsel

90. *Id.* § 83.43(16).

91. Fla. Stat. § 715.102(1).

92. *Id.* § 715.102(2).

93. *Id.* § 715.102(5).

94. *Id.* § 715.101.