

HOTEL RESTAURANT & TRAVEL LAW

Second Edition

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Hotel, Restaurant, and Travel Law

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Preface

Georges Clemenceau, premier of France during World War I, stated that war was too important to entrust only to generals. For a hotel administrator to leave any aspects of running a hotel exclusively to specialists would be equally unwise. Whether a hotel is large or small, its owner has to deal with a proliferation of problems. In a large hotel a staff of cooks, accountants, engineers, lawyers, and personnel managers deal with the diverse aspects of running the hotel. In a small hotel or motel the manager has to rely on ingenuity and skill.

Hotel managers must understand their rights and those of others. They should be aware of laws and regulations pertaining to contracts and labor relations, safety rules and product liability, so that they can limit their exposure to lawsuits of all kinds. They must also know how to fulfill their obligations to the federal, state, and local authorities that regulate the industry.

The intent of this book is not to train lawyers but to inform and educate future hoteliers, restaurateurs, travel personnel, and others in the accommodation industry. With equal skill hotel managers must be able to plan menus with the chef or discuss a troublesome boiler with the engineer, as well as be aware of the legal aspects of running a hotel. Therefore, this book not only provides the essential information that managers need to comply with the law that is applicable to their operations, but it also provides a grounding in preventive tactics by telling them what they must do to avoid lawsuits. And it helps them to identify areas of potential trouble.

If they know where the dangers lie, competent hotel managers can train their personnel to look for trouble. Furthermore, they can knowledgeably deal with hotel guests in case of accidents or differences of opinion. Ignorance of the law is no excuse; the law presumes persons to be aware of their obligations and rights. Preventive law is the solution, and it lies well within the scope of even a modest establishment.

Although some lawsuits result from criminal intent, a great many result from ignorance and neglect. Like many other laypersons, hotelkeepers often have a guarded attitude toward the law. The highly technical methodology of court proceedings, the specialized legal vocabulary, and the ever-present participation of lawyers may encourage this unfor-

tunate attitude. But when a lawyer takes a case, it is already too late—only preventive measures could have altered the facts of the situation.

In the *New York Times* of March 20, 1977, Russell Baker stated that only a lawyer has a chance of waking up in the morning and getting to the bathtub without breaking half a dozen laws for which he can be fined or jailed, or possibly both, by a prosecutor of middling competence. Baker's solution is to make law part of the basic school curriculum. In line with this view, this book seeks to train students to consider the legal aspects of all management decisions by examining actual cases.

The case method of teaching management principles is superior to simply citing general rules that are not always easy to illustrate. In the case method factual situations are described along with the resulting court decisions. Through the study of actual cases students can learn decision making, as well as benefit from the unfortunate results of poor decision making by others. Managers often have very little time to react to situations, so their knowledge of similar cases must be the basis for any decisions.

Where possible, the most recent cases have been used. However, an 1850 case dealing with a specific point of law may still be valid today if it has not been overturned by courts or legislatures. In the older cases the language tends to be somewhat formal, whereas cases written in recent decades generally will be more understandable and relevant to students. The new cases cited also tend to deal more with contemporary situations.

Hotels, restaurants, and the travel industry have changed enormously since the last century. People today have more leisure time and travel more than ever before. The hotels and motels of today are larger—some are virtually small cities—and fast food establishments and condominiums have recently come into their own. Such changes mean that certain legal situations could not have occurred before the 1950s. The 1964 Civil Rights Act, for instance, completely did away with some principles once held to be sacrosanct to hotelkeepers and restaurateurs.

Obviously, more areas of law are now necessary to cover new areas in the hospitality field. Therefore, we have included discussions on camping, mobile homes, and the considerable role and responsibility of the travel agent. The many changes that have taken place in food and alcoholic beverage establishment law during the last decade are also included in the text. A series of problems are included at the end of each chapter that test the skill and proficiency of future hotelkeepers and restaurateurs in solving the kinds of problems they may encounter in real life.

This writing culminates the research of the second edition. One can rightly ask if there is a difference between the first and second edition. The answer, of course, is a resounding yes. Law is not a static body of decisions and statutes but an ever changing body of law that reflects the changing lifestyles of its citizens. Today's hotel is a many-faceted, com-

plex institution. Within its walls it can be a hotel, apartment house, lodging house, rooming house, and condominium. Now it can even accommodate time sharing.

This edition updates all areas discussed in the first edition and adds new areas that have become relevant in the last few years. We explore the delicate problems of sexual harassment, increasing problems of antitrust action against hotels and restaurants, significant court actions in the area of travel and travel agents, and concerted state action against drunken driving. In fact, we include a list of states that have adopted the Dram Shop Act, which allows innocent persons to sue the establishments serving the liquor. A new chapter also deals with such issues as truth in menu and situations in which the IRS may consider tips a part of income.

In closing, we must admit that all names and places referred to in this text are only too real, as were the situations that brought them to court.

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Introduction

Why Study Hotel, Restaurant, and Travel Law?

Without a doubt, preventing potential problems is the most important reason for studying hotel, restaurant, and travel law. In addition to satisfying guests, good management prevents accidents, robberies, or incidents that could lead to lawsuits.

Generally, attorneys deal with the facts of a case only after an incident has taken place; whatever evidence is saved is the material the attorney has to work with. With an awareness of legal implications, the owner or manager can save time, aggravation, and money. Knowing one's own rights is also to know one's guests' rights. Many hotels and restaurants employ consulting attorneys who help clarify any questionable points.

Two recent cases illustrate the need for preventive law. In *Anzaldo v. Groes*, 478 F.2d 466 (S.D., 1973), a five-year-old child fell from a balcony outside her motel room. The court said there was sufficient evidence that the motelkeeper was negligent in not maintaining the balcony and stairway in conformance with community safety standards and that such negligence was a substantial factor in causing the child's injury. The motel manager had a duty to know what was in need of repair and to maintain a checklist of all hazardous places on the property.

In the second case, *Aldrich v. Waldorf Astoria Hotel, Inc.*, 343 N.Y.S. 2d 830 (1973), the hotel leased its checkroom to a concessionaire. The plaintiff deposited her mink jacket in the checkroom while she attended a ball at the hotel. When she returned to claim the coat, it had disappeared. Although the limiting liability statute (a statute that limited the hotel's loss to \$500) may have been operative for the hotel under certain conditions, this statute could not be used by the concessionaire. The court found that the plaintiff could reasonably assume that the hotel operated the checkroom; that a tip constituted payment,¹ and that two garments on one check were not uncommon. The hotel was assessed

1 In a 1981 New York case, *D-M Restaurant Corp. v. Weinberg*, 442 N.Y.S. 2d 965 (1981), the court of appeals held that unless a restaurant formally exacted a fee—not simply accepted a voluntary tip for checking service—the restaurateur could not be forced to pay more than \$75 for a lost coat or other item. This limit was set by law in 1924.

\$1,400. The hotel did file a cross claim against the concessionaire based on an indemnity agreement, but all this took place at the cost of two court actions and a great deal of bad publicity.

Laws of Hotelkeeping Are Unique

Many of the laws dealing with hotels are exceptions to the rule as found in general business law. Even before the 1964 Civil Rights Act, innkeepers were compelled to receive and entertain strangers, and if they did not do so, they could be found guilty of a crime. Restaurateurs, on the other hand, were not legally required to accept all strangers (absent a state statute) until the Civil Rights Act of 1964. Additionally, hotelkeepers are held to an absolute liability for their guests' goods in the absence of a limiting liability statute. And adequate protection must be provided the guest. The Connie Francis rape case, *Garzelli v. Howard Johnson's Motor Lodge, Inc.*, 419 F.Supp. 1210 (N.Y. 1976), in which Francis was awarded \$2.4 million for inadequate protection, is a forceful reminder of this common law requirement.

The Dram Shop Act, a statute that holds purveyors of alcoholic beverages liable for the actions of their patrons outside their establishment, is rather unique. In the *Stacy* case, in which the promising young actor James Stacy and his motorcycle companion were hit by a drunk driver, costing Stacy his arm and leg and killing his companion, Stacy received \$1.9 million from the bar owner who served liquor to the driver. Over \$300,000 was collected by the family of Stacy's companion. Thus, the responsibility attaching to the hotel, restaurant, and travel industry is severe and may be likened to that of common carriers, which must exert greater than ordinary care for their customers. (California has since done away with the Dram Shop Act by legislation because of the lobbying of the hoteliers and restaurateurs.)

Familiarization with Legal Procedure and Research

An exposure to hotel, restaurant, and travel law will not only familiarize students with this area of law but also with how the laws can be researched. Although each state has its own unique statutory and common laws, this book deals with the law followed by the majority of the states and also gives, where possible, the minority view if it helps to illustrate a management principle.

A section on legal research is included in chapter 2 to help students familiarize themselves with the laws and court decisions of any state. Also covered is shepardization, the method by which statutes or legal cases are updated—whether modified or overruled by court decisions or legislation. Although this book is not intended to train lawyers, it will enable managers to speak more intelligently to their attorneys and to understand how a law case proceeds in the courts.

Development of Sound Management Techniques

By learning from the mistakes of others, managers can try to prevent recurrences of certain common legal cases. Probably 20 to 30 percent of common legal cases could be avoided if well-trained managers and personnel were to use a simple but effective creed—graciousness. Carefully trained service personnel are aware of potential problems and how they should be handled; they are gracious in their comments and actions. Often very busy or successful hoteliers and restaurateurs may become somewhat arrogant in their management techniques. They may become imbued with a sense of their own importance; they may lack competitors; or they may lose sight of their own true function—service. The participation of university- and trade school-trained personnel should help increase the number of competent personnel in the service industry.

Vocabulary Enrichment

Unfortunately, the law has long been the exclusive domain of lawyers, and the lay public has been discouraged from mastering its intricacies by the legal jargon encountered. However, investigating an area as important as the law need no longer be denied the layperson. Granted, a vocabulary of the most important words is necessary, and learning 200 to 300 new words can make one quite responsive to the cases and the logic of the law. The glossary at the end of this book contains legal words explained in lay terms.

Familiarity with the Court System

People going into business, as well as today's increasingly active consumers, must understand how they can use the courts. The court systems on state, federal, and constitutional questions are illustrated in chapter 2. To help students understand how a case is brought to trial, a hypothetical situation has been created from the beginning of the action through all of the various appeals open to each of the involved parties.

Knowledge of Federal and State Constitutions and Statutes

Infractions of the federal and state constitutions occur daily. Illegal search and seizure, false imprisonment, and the problems inherent in overbooking make a knowledge of the law essential to all members of this society.

In this book, concrete examples in the form of cases illustrate the correct way to proceed in problem situations that may arise in the hotel, restaurant, and travel industry. For instance, a desk clerk should know that the police must have a warrant before a guest's room may be legally searched; that false imprisonment can mean detaining a person against

his will simply by saying, "Wait here;" and that overbooking is actually a breach of contract in which damages may be recovered. This last practice is so prevalent that it could lead to government intervention to protect travelers' rights.

Bringing about Change

To lobby for a change, people must know what they are trying to change and the reasons for the change. A familiarity with hotel, restaurant, and travel law will aid students in recognizing the problems involved. The travel industry, made up of such diverse businesses as hotels, motels, and tourist courts; eating and drinking establishments; gasoline service stations; rooming and boarding houses; trailer parks and campgrounds; retail stores; cleaning and laundry establishments; movie theaters; theatrical and entertainment establishments; sports and other recreational facilities; and transportation carriers such as airlines, buses, railroads, and taxis, has the potential to form one of the more influential lobbies in the United States.

It is possible to lobby for change as demonstrated by the passage of a 1976 Massachusetts statute dealing with how guests may register. Prior to this statute, at least one guest had to sign personally per room. The not infrequent situation of a hundred or so guests arriving at one time led to the need for a change. Now any group larger than five persons may be preassigned rooms, and the guests may go directly to their rooms, with the assignment constituting adequate notice of registration.

Changing Lifestyles and the Law

The law is constantly changing so those in the travel industry must be alert and try to anticipate which changes in mores and life-styles can affect their business operations. In the past *psychographics*, the study of changing lifestyles, was of interest only to sociologists, psychologists, and perhaps statisticians. Today, however, it can help those in the hospitality and travel industry. Psychographics can be used as an indicator of the morality of the times, which in turn reflects upon what customers will expect of a facility insofar as their personal use is concerned. Psychographics can also help delineate to what degree hoteliers can deviate from the rules of accommodation set down during a different time when different codes of conduct prevailed.

A well-known example of changing mores and the changing law is the so-called Lee Marvin case. A woman who had cohabited with actor Lee Marvin for a period of years sought to be compensated for what she had given up while she was Marvin's live-in friend, as well as some form of payment or share of the possessions Marvin had accumulated during this period of cohabitation. Although they were not married, the court awarded Marvin's friend \$104,000 for what it labeled "rehabitation pur-

poses.” In August 1981, the court of appeals reversed the award but not the principle on which the case is based. In effect, the state of California gave legal recognition to cohabitation, a form of relationship considered illegal in the past.

Although some twenty-eight states now sanction this sort of relationship, others do not. Assume you are the hotelier in a state that prohibits fornication, lewd cohabitation, and a multitude of other so-called immoral acts and a couple who has been openly living together for years, despite the fact that they are not legally married, wants a room to share in your hotel. Not only have they been accepted by society as not being immoral, but the courts, by permitting cohabitators and former cohabitators access to the courts, are in effect judicially sanctioning the relationship. If the courts viewed the relationship as illegal, those so situated would not be permitted to litigate their disputes in court, for the courts cannot and will not be permitted to be used to enforce or determine rights under an illegal agreement.

Not too many years ago the solution would have been simple: either refuse them accommodations or require them to take two separate rooms. But according to today's code of social conduct, the couple is not being immoral; rather for personal reasons they prefer not to marry. If you refuse them a room, are you violating the duty to accommodate? By making an issue of the fact that they are not married, are you subjecting them to public humiliation by refusing them a room for that reason? If the answer to either of these last two questions is in the affirmative, then you may have just opened yourself to a possible lawsuit.

The law is different in most states so this book cannot supply an answer that would be uniformly applicable to such a case. Rather, the purpose is to admonish students to stay abreast of changes in social attitudes and determine how these changes may affect business. Hoteliers in such situations should present the problem to counsel for their guidance and advice on what legal exposure they would be incurring on behalf of themselves and the house. In short, hoteliers who anticipate and are prepared should find that their legal problems are minimized.

Training in Legal Thinking

Legal study is not the mere communication of facts. What every student should gain from studying the legalities of hotel, restaurant, and travel management is a command, even if only a limited one, of the legal thought process.

Hotels are controlled by both statutory and common law, as are all other business endeavors. Most of the fundamental principles of the American legal system have ancient roots. Interpretations of the law, however, change with the times. And there is sometimes wide diversity between the laws of various states on any one given point. Only the

majority view is fully discussed in this book, but the minority view is often given to show differing opinions.

An Outline of This Book

Hotel, restaurant, or travel management students need a firm grasp of both legal and management principles that will govern their future relationships and responsibilities to their guests and employees. English common law is the basis for most American laws and statutes covering hotels and restaurants. The brief survey in chapter 1 introduces students to the traditions and customs that have helped to shape contemporary U.S. laws. In addition, the civil law system—particularly as it pertains to hospitality law—is briefly discussed.

Chapter 2 is an introduction to legal research for future managers. In it are outlined the kinds of legal materials, including official sources, such as constitutions and statutes, and unofficial sources, such as legal encyclopedias and law reviews, that will aid nonlawyers wishing to do legal research.

Throughout this book, cases—court decisions—are used to illustrate general hospitality management principles. The discussion in chapter 2 illustrates the components of cases and traces step by step the journey of a case through the U.S. court system.

Chapters 3 and 4 list some of the principles that govern the legal definitions of types of accommodations, as well as the distinctive responsibilities the managers of each have to their guests. The guest-innkeeper relationship is outlined in chapter 4 and illustrated by several recent important legal decisions. Chapter 4 also includes an important discussion of part of the guest's responsibility to the innkeeper—forms of payment, including money, credit cards, and personal and traveler's checks—as well as a comprehensive section on financial protection for hotel operators.

Chapter 5 discusses licenses—which are special privileges—required by operators of public accommodations, as well as statutory regulations such as zoning that affect such businesses.

The relationships between various patrons and the hotelkeeper are considered in chapter 6, including definitions of when such relationships begin and end and how they are modified by acts of the guest.

One of the most important pieces of legislation ever affecting the hospitality industry is the Civil Rights Act of 1964. The limits that it and other state antidiscrimination statutes put on hotel and restaurant operators are discussed in chapter 7, as well as throughout other chapters.

Chapter 8 outlines important safety principles for hotel and restaurant operators. It defines negligence and the doctrine of torts (personal

wrongs). The cases in chapter 8 provide invaluable examples of the need for preventive management.

It is essential for hotelkeepers to recognize the extent of guests' rights. In chapter 9 these rights are outlined in terms of contract law, security and safety, and protection from false arrest or lockout. It also considers the rights of other hotel visitors, such as guests of guests.

Guests' rights are also established by the duties owed them by management. These duties are outlined in chapter 10, which includes cases and discussions of the condition of rooms, public areas, restaurants and bars within the hotel, and outside and special areas. An important duty is owed in a special area—swimming pools, waterfronts, and lake areas.

Not only guests but their property as well are protected by the hotelkeeper's liabilities to guests. Chapter 11 discusses both common law and statutory liabilities to guests' property and where the liability starts and ends. This chapter also extends illustrations and cases to one of the traveler's most significant properties—the automobile.

All this is not to say that hotelkeepers have no protection from negligent or fraudulent guests, however. As chapter 13 shows in cases and illustrations, there are important safeguards in setting reasonable rules for guests, evicting nonpaying or undesirable guests, and in using force and care to deal with unruly patrons. The hotel lien (attachment of the nonpaying guest's property) is an important statutory safeguard for the hotelkeeper. Where this lien right was formerly granted without exception to hotelkeepers, today it is under serious attack from guests in many states. Several states have already outlawed the hotel lien. If goods are kept in these states, the hotelkeeper can be guilty of larceny.

Laws governing the restaurant or tavern operator's relationship with guests often differ from the legal principles governing the rest of the hospitality industry. Chapter 13 discusses both the rights and the liabilities of restaurateurs and tavern operators in two major areas: food service and alcoholic beverages.

As affluence and leisure increase in American society, so does the mobility of its citizens. Chapter 14 is a unique discussion of a new area of the hospitality industry: campgrounds, mobile homes, and tourist courts. It presents cases illustrating the rights and liabilities of managers in this new and growing area.

Mobility also is responsible for the increased use of travel agents, as is shown in chapter 15. Special legal principles govern the agent's relationships with clients as well as with suppliers of such services as transportation and hotel accommodations. While travelers are protected against baggage loss, cancellations, and overbooking, travel agents also have important legal safeguards, as the discussion of disclaimers and insurance illustrates.

Chapter 16 brings new material to the book but not new material to the industry. Sexual harrassment has been with us for many years and is examined with the hope that we can do something about it. How to

attack the problem of over 13,000 fires in the hotel industry is faced in this chapter, as well as becoming knowledgeable in the areas of bomb threats, first aid, security, and elevator malfunctions. Truth in menu and how the IRS looks at tips in the industry are also explored.

Finally, the appendixes provide limiting liability statutes by states, states' positions on third party liability for sales to intoxicated persons, statutes dealing with defrauding an innkeeper, and guidelines on sex discrimination.

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