



State of New Jersey
GOVERNMENT RECORDS COUNCIL

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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

RICHARD E. CONSTABLE, III
Commissioner

INTERIM ORDER

March 25, 2014 Government Records Council Meeting

Robert A. Verry
Complainant

Complaint Nos. 2013-43 & 2013-53

v.

Borough of South Bound Brook (Somerset)
Custodian of Record

At the March 25, 2014 public meeting, the Government Records Council (“Council”) considered the March 18, 2014 Supplemental Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council, by a majority vote, adopted the entirety of said findings and recommendations. The Council, therefore, finds that:

1. The Custodian is in contempt of the Council’s September 24, 2013 Interim Order because he failed to comply with the terms of said Order within the prescribed time frame.
2. “The Council shall, pursuant to the New Jersey Rules governing the Courts, R. 4:67-6, have the authority to enforce compliance with the orders and decisions issued by the Council.” N.J.A.C. 5:105-2.9(c). The Council’s September 24, 2013 Interim Order to disclose the relevant records is enforceable in the Superior Court if the Complainant decides to exercise that option. R. 4:67-6. As this complaint should be referred to the Office of Administrative Law for the limited purposes described below, the Council emphasizes that the issue of disclosure of records has already been determined by the Council, and thus is not an outstanding issue before the Office of Administrative Law.
3. The Custodian may have failed to bear his burden of proving a lawful denial of access to OPRA requests that the Council determined to be valid in accordance with precedential case law. The Council rejected Custodian Counsel’s request for reconsideration and the Appellate Division denied a motion for leave to appeal the Council’s September 24, 2013 Interim Order; thus, the Custodian was required to comply with the Council’s Order. Having failed to comply, the Custodian is in contempt of said Order. Therefore, based on the evidence of record, it is possible that the Custodian’s actions were intentional and deliberate, with knowledge of their wrongfulness, and not merely negligent, heedless or unintentional. As such, the complaint should be referred to the OAL for determination of whether the Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances.



4. Pursuant to the Council's September 24, 2013, Interim Order, the Complainant has achieved "the desired result because the complaint brought about a change (voluntary or otherwise) in the custodian's conduct." Teeters v. DYFS, 387 N.J. Super. 423 (App. Div. 2006). Additionally, a factual causal nexus exists between the Complainant's filing of a Denial of Access Complaint and the relief ultimately achieved. Mason v. City of Hoboken and City Clerk of the City of Hoboken, 196 N.J. 51 (2008). Specifically, the Council determined that both OPRA requests were valid and ordered disclosure of any responsive records or a certification to the disclosability or existence of same. Further, the relief ultimately achieved had a basis in law. Therefore, the Complainant is a prevailing party entitled to an award of a reasonable attorney's fee. *See* N.J.S.A. 47:1A-6, Teeters, 387 N.J. Super. 432, and Mason, 196 N.J. 51. For administrative ease, the Office of Administrative Law should determine the amount of the award of reasonable attorney's fees.

Interim Order Rendered by the
Government Records Council
On The 25th Day of March, 2014

Robin Berg Tabakin, Esq., Chair
Government Records Council

I attest the foregoing is a true and accurate record of the Government Records Council.

Steven Ritardi, Esq., Secretary
Government Records Council

Decision Distribution Date: March 26, 2014

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Supplemental Findings and Recommendations of the Executive Director
March 25, 2014 Council Meeting**

**Robert A. Verry¹
Complainant**

GRC Complaint No. 2013-43 & 2013-53²

v.

**Borough of South Bound Brook (Somerset)³
Custodial Agency**

Records Relevant to Complaint:

December 11, 2012 OPRA request: Electronic copies via e-mail of any and all e-mails and/or correspondence between any agent for the Borough of South Bound Brook (“Borough”) including but not limited to Maria Caemmerer, Arleen Lih, Randy Bahr, Francis Linnus, Francesco Taddeo, Mayor Tama Ormosi, Councilpersons Blumenthal, Quinlan, Shoffner, Duh, Dykes and Conner, any police department employee, the Custodian and Joseph Danielsen regarding the Complainant and any variation of his name, including but not limited to nicknames, between January 1, 2012 and December 11, 2012.

February 3, 2013 OPRA request: Electronic copies via e-mail of any and all e-mails and/or correspondence from Joseph Danielsen to any agent for the Borough including but not limited to the Custodian, Maria Caemmerer, Arleen Lih, Randy Bahr, Francis Linnus, Francesco Taddeo, Mayor Tama Ormosi, Councilpersons Blumenthal, Quinlan, Shoffner, Duh, Dykes and Conner, and any police department employee regarding the Complainant and any variation of his name, including but not limited to nicknames, between January 1, 2012 and December 31, 2012.

Custodian of Record: Donald E. Kazar

Request Received by Custodian: December 11, 2012 and February 3, 2013

Response Made by Custodian: December 19, 2012 and February 12, 2013

GRC Complaint Received: February 7, 2013 and February 19, 2013

Background

November 19, 2013 Council Meeting:

At its November 19, 2013 public meeting, the Council considered the November 12, 2013 Supplemental Findings and Recommendations of the Executive Director and all related

¹ Represented by John A. Bermingham, Jr., Esq. (Mount Bethel, PA) and Walter M. Luers, Esq., of Law Office of Walter M. Luers, LLC (Clinton, NJ).

² The GRC has consolidated these complaints for adjudication because of the commonality of the parties and issues.

³ Represented by Robert G. Wilson, Esq., of Kovacs & Wilson (Somerville, NJ).

documentation submitted by the parties. The Council, by a majority vote, adopted said findings and recommendations. The Council, therefore, found that:

[T]he Custodian has failed to establish in his request for reconsideration of the Council's September 24, 2013 Interim Order that either 1) the Council's decision is based upon a "palpably incorrect or irrational basis;" or 2) it is obvious that the Council did not consider the significance of probative, competent evidence. The Custodian failed to establish that the complaint should be reconsidered based on a mistake. Specifically, in Verry v. Borough of South Bound Brook (Somerset), GRC Complaint No. 2013-43 *et seq.*, (September 2013), the GRC highlighted what would be deemed a reasonable search and further noted that a custodian is not required to conduct research. *Id.* at 5-6. The Custodian has also failed to show that the Council acted arbitrarily, capriciously or unreasonably. Specifically, the Custodian submitted arguments previously presented in the Statement of Information already considered by the Council and provides no new arguments supporting that the GRC made a mistake. Thus, the Custodian's request for reconsideration should be denied. Cummings v. Bahr, 295 N.J. Super. 374 (App. Div. 1996); D'Atria v. D'Atria, 242 N.J. Super. 392 (Ch. Div. 1990); In The Matter Of The Petition Of Comcast Cablevision Of South Jersey, Inc. For A Renewal Certificate Of Approval To Continue To Construct, Operate And Maintain A Cable Television System In The City Of Atlantic City, County Of Atlantic, State Of New Jersey, 2003 N.J. PUC LEXIS 438, 5-6 (N.J. PUC 2003). Thus, the Council's September 24, 2013 Interim Order remains in effect and the Custodian must comply with same as ordered.

Procedural History:

On November 20, 2013, the Council distributed its Interim Order to all parties. On November 25, 2013, the Custodian's Counsel requested a stay of the Council's Interim Order pending an appeal. On December 4, 2013, the GRC denied Counsel's request because it had not received a motion for leave to appeal. On December 10, 2013, Counsel filed a motion for leave to appeal with the Appellate Division and renewed his request for a stay. On December 11, 2013, the GRC granted Counsel's request for a stay. On January 29, 2014, the Appellate Division denied Custodian Counsel's motion for leave to appeal the Council's decision.

On February 4, 2014, the GRC advised the Custodian's Counsel that the stay has been lifted and that the Custodian must comply with the Council's Order in accordance with the language set forth therein. On February 18, 2014, the Complainant's Counsel stated the Custodian failed to comply with the Council's Order.

Analysis

Compliance

At its September 24, 2013 meeting, the Council ordered the Custodian to provide records reasonably responsive to the Complainant's two (2) OPRA requests or to certify to the

disclosability and/or existence of same. The Order further required that the Custodian submit certified confirmation of compliance, in accordance with N.J. Court Rule 1:4-4, to the Executive Director. On September 25, 2013, the Council distributed its Interim Order to all parties, providing the Custodian five (5) business days to comply with the terms of said Order.

Following the Council's denial of a request for reconsideration on November 19, 2013, the GRC granted Custodian Counsel's request for a stay of the September 24, 2013 Order to allow the Appellate Division to rule on Custodian Counsel's motion for leave to appeal. On January 29, 2014, the Appellate Division denied the motion. On February 4, 2014, the GRC lifted the stay and stated that the Custodian must comply with the Council's Order. Therefore, the last day for the Custodian to comply with the Council's Order was February 11, 2014.

The Custodian did not respond within that time frame. On February 18, 2014, the Complainant's Counsel advised that he received no response, thus corroborating the Custodian's failure to respond to the Order.

Therefore, the Custodian is in contempt of the Council's September 24, 2013 Interim Order because he failed to comply with the terms of said Order within the prescribed time frame.

Council's September 24, 2013 Interim Order is Enforceable

"The Council shall, pursuant to the New Jersey Rules governing the Courts, R. 4:67-6, have the authority to enforce compliance with the orders and decisions issued by the Council." N.J.A.C. 5:105-2.9(c). The Council's September 24, 2013 Interim Order to disclose the relevant records is enforceable in the Superior Court if the Complainant decides to exercise that option. R. 4:67-6. As this complaint should be referred to the Office of Administrative Law ("OAL"), for the limited purposes described below, the Council emphasizes that the issue of disclosure of records has already been determined by the Council, and thus is not an outstanding issue before the OAL.

Knowing & Willful

OPRA states that "[a] public official, officer, employee or custodian who knowingly or willfully violates [OPRA], and is found to have unreasonably denied access under the totality of the circumstances, shall be subject to a civil penalty ..." N.J.S.A. 47:1A-11(a). OPRA allows the Council to determine a knowing and willful violation of the law and unreasonable denial of access under the totality of the circumstances. Specifically OPRA states "... [i]f the council determines, by a majority vote of its members, that a custodian has knowingly and willfully violated [OPRA], and is found to have unreasonably denied access under the totality of the circumstances, the council may impose the penalties provided for in [OPRA]..." N.J.S.A. 47:1A-7(e).

Certain legal standards must be considered when making the determination of whether the Custodian's actions rise to the level of a "knowing and willful" violation of OPRA. The following statements must be true for a determination that the Custodian "knowingly and willfully" violated OPRA: the Custodian's actions must have been much more than negligent

conduct (Alston v. City of Camden, 168 N.J. 170, 185 (2001)); the Custodian must have had some knowledge that his actions were wrongful (Fielder v. Stonack, 141 N.J. 101, 124 (1995)); the Custodian's actions must have had a positive element of conscious wrongdoing (Berg v. Reaction Motors Div., 37 N.J. 396, 414 (1962)); the Custodian's actions must have been forbidden with actual, not imputed, knowledge that the actions were forbidden (*id.*; Marley v. Borough of Palmyra, 193 N.J. Super. 271, 294-95 (Law Div. 1993)); the Custodian's actions must have been intentional and deliberate, with knowledge of their wrongfulness, and not merely negligent, heedless or unintentional (ECES v. Salmon, 295 N.J. Super. 86, 107 (App. Div. 1996)).

The Custodian may have failed to bear his burden of proving a lawful denial of access to OPRA requests that the Council determined to be valid in accordance with precedential case law. The Council rejected Custodian Counsel's request for reconsideration and the Appellate Division denied a motion for leave to appeal the Council's September 24, 2013 Interim Order; thus, the Custodian was required to comply with the Council's Order. Having failed to comply, the Custodian is in contempt of said Order. Therefore, based on the evidence of record, it is possible that the Custodian's actions were intentional and deliberate, with knowledge of their wrongfulness, and not merely negligent, heedless or unintentional. As such, the complaint should be referred to the OAL for determination of whether the Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances.

Prevailing Party Attorney's Fees

OPRA provides that:

A person who is denied access to a government record by the custodian of the record, at the option of the requestor, may: institute a proceeding to challenge the custodian's decision by filing an action in Superior Court ...; or in lieu of filing an action in Superior Court, file a complaint with the Government Records Council ... A requestor who prevails in any proceeding shall be entitled to a reasonable attorney's fee.

N.J.S.A. 47:1A-6.

In Teeters v. DYFS, 387 N.J. Super. 423 (App. Div. 2006), the Court held that a complainant is a "prevailing party" if he achieves the desired result because the complaint brought about a change (voluntary or otherwise) in the custodian's conduct. *Id.* at 432. Additionally, the Court held that attorney's fees may be awarded when the requestor is successful (or partially successful) via a judicial decree, a quasi-judicial determination, or a settlement of the parties that indicates access was improperly denied and the requested records are disclosed. *Id.*

Additionally, the New Jersey Supreme Court has ruled on the issue of "prevailing party" attorney's fees. In Mason v. City of Hoboken and City Clerk of the City of Hoboken, 196 N.J. 51 (2008), the Supreme Court discussed the catalyst theory, "which posits that a plaintiff is a 'prevailing party' if it achieves the desired result because the lawsuit brought about a voluntary

change in the defendant's conduct." Mason, 196 N.J. at 71, (quoting Buckhannon Bd. & Care Home v. West Virginia Dep't of Health & Human Res., 532 U.S. 598, 131 S. Ct. 1835, 149 L. Ed. 2d 855 (2001)). In Buckhannon, the Supreme Court stated that the phrase "prevailing party" is a legal term of art that refers to a "party in whose favor a judgment is rendered." (quoting Black's Law Dictionary 1145 (7th ed. 1999)). The Supreme Court rejected the catalyst theory as a basis for prevailing party attorney fees, in part because "[i]t allows an award where there is no judicially sanctioned change in the legal relationship of the parties," Id. at 605, 121 S. Ct. at 1840, 149 L. Ed. 2d at 863, but also over concern that the catalyst theory would spawn extra litigation over attorney's fees. Id. at 609, 121 S. Ct. at 1843, 149 L. Ed. 2d at 866.

However, the Court noted in Mason, that Buckhannon is binding only when counsel fee provisions under federal statutes are at issue. 196 N.J. at 72, *citing* Teeters, 387 N.J. Super. at 429; *see, e.g.*, Baer v. Klagholz, 346 N.J. Super. 79 (App. Div. 2001) (applying Buckhannon to the federal Individuals with Disabilities Education Act), *certif. denied*, 174 N.J. 193 (2002). "But in interpreting New Jersey law, we look to state law precedent and the specific state statute before us. When appropriate, we depart from the reasoning of federal cases that interpret comparable federal statutes." 196 N.J. at 73 (citations omitted).

The Mason Court accepted the application of the catalyst theory within the context of OPRA, stating that:

OPRA itself contains broader language on attorney's fees than the former RTKL did. OPRA provides that "[a] requestor who prevails in any proceeding shall be entitled to a reasonable attorney's fee." N.J.S.A. 47:1A-6. Under the prior RTKL, "[a] plaintiff in whose favor such an order [requiring access to public records] issues ... may be awarded a reasonable attorney's fee not to exceed \$500.00." N.J.S.A. 47:1A-4 (repealed 2002). The Legislature's revisions therefore: (1) mandate, rather than permit, an award of attorney's fees to a prevailing party; and (2) eliminate the \$500 cap on fees and permit a reasonable, and quite likely higher, fee award. Those changes expand counsel fee awards under OPRA.

Mason at 73-76 (2008).

The Court in Mason, further held that:

[R]equestors are entitled to attorney's fees under OPRA, absent a judgment or an enforceable consent decree, when they can demonstrate (1) 'a factual causal nexus between plaintiff's litigation and the relief ultimately achieved'; and (2) 'that the relief ultimately secured by plaintiffs had a basis in law.' Singer v. State, 95 N.J. 487, 495, *cert denied* (1984).

Id. at 76.

In this matter, the Custodian denied access to the Complainant's two (2) OPRA requests stating that same were overly broad. The Complainant filed this complaint arguing that his requests were valid. The Council, in its September 24, 2013 Interim Order, held that the OPRA

requests were valid and that the Custodian may have unlawfully denied access to the responsive records. The Council thus ordered the Custodian to provide to the Complainant readily identifiable records or legal certify to the disclosability or existence of same. Thereafter, the Custodian failed to comply with the Council's Order. Thus, notwithstanding the Custodian's failure to comply, the Complainant is a prevailing party.

Therefore, pursuant to the Council's September 24, 2013, Interim Order, the Complainant has achieved "the desired result because the complaint brought about a change (voluntary or otherwise) in the custodian's conduct." Teeters, 387 N.J. Super. 432. Additionally, a factual causal nexus exists between the Complainant's filing of a Denial of Access Complaint and the relief ultimately achieved. Mason, 196 N.J. 51. Specifically, the Council determined that both OPRA requests were valid and ordered disclosure of any responsive records or a certification to the disclosability or existence of same. Further, the relief ultimately achieved had a basis in law. Therefore, the Complainant is a prevailing party entitled to an award of a reasonable attorney's fee. See N.J.S.A. 47:1A-6, Teeters, 387 N.J. Super. 432, and Mason, 196 N.J. 51. For administrative ease, the OAL should determine the amount of the award of reasonable attorney's fees.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Custodian is in contempt of the Council's September 24, 2013 Interim Order because he failed to comply with the terms of said Order within the prescribed time frame.
2. "The Council shall, pursuant to the New Jersey Rules governing the Courts, R. 4:67-6, have the authority to enforce compliance with the orders and decisions issued by the Council." N.J.A.C. 5:105-2.9(c). The Council's September 24, 2013 Interim Order to disclose the relevant records is enforceable in the Superior Court if the Complainant decides to exercise that option. R. 4:67-6. As this complaint should be referred to the Office of Administrative Law for the limited purposes described below, the Council emphasizes that the issue of disclosure of records has already been determined by the Council, and thus is not an outstanding issue before the Office of Administrative Law.
3. The Custodian may have failed to bear his burden of proving a lawful denial of access to OPRA requests that the Council determined to be valid in accordance with precedential case law. The Council rejected Custodian Counsel's request for reconsideration and the Appellate Division denied a motion for leave to appeal the Council's September 24, 2013 Interim Order; thus, the Custodian was required to comply with the Council's Order. Having failed to comply, the Custodian is in contempt of said Order. Therefore, based on the evidence of record, it is possible that the Custodian's actions were intentional and deliberate, with knowledge of their wrongfulness, and not merely negligent, heedless or unintentional. As such, the complaint should be referred to the OAL for determination of whether the Custodian

knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances.

4. Pursuant to the Council's September 24, 2013, Interim Order, the Complainant has achieved "the desired result because the complaint brought about a change (voluntary or otherwise) in the custodian's conduct." Teeters v. DYFS, 387 N.J. Super. 423 (App. Div. 2006). Additionally, a factual causal nexus exists between the Complainant's filing of a Denial of Access Complaint and the relief ultimately achieved. Mason v. City of Hoboken and City Clerk of the City of Hoboken, 196 N.J. 51 (2008). Specifically, the Council determined that both OPRA requests were valid and ordered disclosure of any responsive records or a certification to the disclosability or existence of same. Further, the relief ultimately achieved had a basis in law. Therefore, the Complainant is a prevailing party entitled to an award of a reasonable attorney's fee. *See* N.J.S.A. 47:1A-6, Teeters, 387 N.J. Super. 432, and Mason, 196 N.J. 51. For administrative ease, the Office of Administrative Law should determine the amount of the award of reasonable attorney's fees.

Prepared By: Frank F. Caruso
Senior Case Manager

Approved By: Dawn R. SanFilippo, Esq.
Senior Counsel

March 18, 2014



State of New Jersey
GOVERNMENT RECORDS COUNCIL

101 SOUTH BROAD STREET
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CHRIS CHRISTIE
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Commissioner

INTERIM ORDER

November 19, 2013 Government Records Council Meeting

Robert A. Verry
Complainant

Complaint Nos. 2013-43 and 2013-53

v.

Borough of South Bound Brook (Somerset)
Custodian of Record

At the November 19, 2013 public meeting, the Government Records Council (“Council”) considered the November 12, 2013 Supplemental Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council, by a majority vote, adopted the entirety of said findings and recommendations. The Council, therefore, finds that the Custodian has failed to establish in his request for reconsideration of the Council’s September 24, 2013 Interim Order that either 1) the Council’s decision is based upon a “palpably incorrect or irrational basis;” or 2) it is obvious that the Council did not consider the significance of probative, competent evidence. The Custodian failed to establish that the complaint should be reconsidered based on a mistake. Specifically, in Verry v. Borough of South Bound Brook (Somerset), GRC Complaint No. 2013-43 *et seq.*, (September 2013), the GRC highlighted what would be deemed a reasonable search and further noted that a custodian is not required to conduct research. Id. at 5-6. The Custodian has also failed to show that the Council acted arbitrarily, capriciously or unreasonably. Specifically, the Custodian submitted arguments previously presented in the Statement of Information already considered by the Council and provides no new arguments supporting that the GRC made a mistake. Thus, the Custodian’s request for reconsideration should be denied. Cummings v. Bahr, 295 N.J. Super. 374 (App. Div. 1996); D’Atria v. D’Atria, 242 N.J. Super. 392 (Ch. Div. 1990); In The Matter Of The Petition Of Comcast Cablevision Of South Jersey, Inc. For A Renewal Certificate Of Approval To Continue To Construct, Operate And Maintain A Cable Television System In The City Of Atlantic City, County Of Atlantic, State Of New Jersey, 2003 N.J. PUC LEXIS 438, 5-6 (N.J. PUC 2003). Thus, the Council’s September 24, 2013 Interim Order remains in effect and the Custodian must comply with same as ordered.



Interim Order Rendered by the
Government Records Council
On The 19th Day of November, 2013

Robin Berg Tabakin, Esq., Chair
Government Records Council

I attest the foregoing is a true and accurate record of the Government Records Council.

Steven Ritardi, Esq., Secretary
Government Records Council

Decision Distribution Date: November 20, 2013

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

Reconsideration
Supplemental Findings and Recommendations of the Executive Director
November 19, 2013 Council Meeting

Robert A. Verry¹
Complainant

GRC Complaint No. 2013-43 & 2013-53²

v.

Borough of South Bound Brook (Somerset)³
Custodial Agency

Records Relevant to Complaint:

December 11, 2012 OPRA request: Electronic copies via e-mail of any and all e-mails and/or correspondence between any agent for the Borough of South Bound Brook (“Borough”) including but not limited to Maria Caemmerer, Arleen Lih, Randy Bahr, Francis Linnus, Francesco Taddeo, Mayor Tama Ormosi, Councilpersons Blumenthal, Quinlan, Shoffner, Duh, Dykes and Conner, any police department employee, the Custodian and Joseph Danielsen regarding the Complainant and any variation of his name, including but not limited to nicknames, between January 1, 2012 and December 11, 2012.

February 3, 2013 OPRA request: Electronic copies via e-mail of any and all e-mails and/or correspondence from Joseph Danielsen to any agent for the Borough including but not limited to the Custodian, Maria Caemmerer, Arleen Lih, Randy Bahr, Francis Linnus, Francesco Taddeo, Mayor Tama Ormosi, Councilpersons Blumenthal, Quinlan, Shoffner, Duh, Dykes and Conner, and any police department employee regarding the Complainant and any variation of his name, including but not limited to nicknames, between January 1, 2012 and December 31, 2012.

Custodian of Record: Donald E. Kazar

Request Received by Custodian: December 11, 2012 and February 3, 2013

Response Made by Custodian: December 19, 2012 and February 12, 2013

GRC Complaint Received: February 7, 2013 and February 19, 2013

¹ Represented by John A. Bermingham, Jr., Esq. (Mount Bethel, PA).

² The GRC has consolidated these complaints for adjudication because of the commonality of the parties and issues.

³ Represented by Robert G. Wilson, Esq., of Kovacs & Wilson (Somerville, NJ).

Background

September 24, 2013 Council Meeting:

At its September 24, 2013 public meeting, the Council considered the September 17, 2013 Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council, by a majority vote, adopted said findings and recommendations. The Council, therefore, found that:

1. The Custodian may have failed to bear his burden of proving a lawful denial of access to any responsive records. N.J.S.A. 47:1A-6. Thus, the Custodian shall provide those readily identifiable records that existed at the time of the Complainant's two (2) OPRA requests, if any. If the Custodian believes certain records are exempt from disclosure or that no records exist, the Custodian must legally certify to these facts. The GRC notes that because the time frames contained in the OPRA requests overlap, there is no need for the Custodian to provide the Complainant duplicate copies of records responsive to both requests.
2. **The Custodian shall comply with item No. 1 above within five (5) business days from receipt of the Council's Interim Order with appropriate redactions, including a detailed document index explaining the lawful basis for each redaction, and simultaneously provide certified confirmation of compliance, in accordance with N.J. Court Rule 1:4-4,⁴ to the Executive Director.⁵**
3. The Council defers analysis of whether the Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.
4. The Council defers analysis of whether the Complainant is a prevailing party pending the Custodian's compliance with the Council's Interim Order.

Procedural History:

On September 25, 2013, the Council distributed its Interim Order to all parties. On October 1, 2013, the Custodian requested five (5) additional business days to submit a request for reconsideration. On October 2, 2013, the GRC granted the Custodian's request for an extension until October 9, 2013.

On October 4, 2013, the Custodian filed a request for reconsideration of the Council's September 24, 2013 Interim Order based on a mistake. The Custodian argues that the Council

⁴ "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."

⁵ Satisfactory compliance requires that the Custodian deliver the records to the Complainant in the requested medium. If a copying or special service charge was incurred by the Complainant, the Custodian must certify that the record has been *made available* to the Complainant but the Custodian may withhold delivery of the record until the financial obligation is satisfied. Any such charge must adhere to the provisions of N.J.S.A. 47:1A-5.

erred by not invalidating the Complainant's portion of the request referring to nicknames and seeking e-mails to or from any "agent" of the Borough.

On October 8, 2013, the Complainant's Counsel submitted objections to the request for reconsideration. Counsel contended that the Custodian failed to prove the Council made a mistake and merely reargued his position from the Statement of Information.

Analysis

Reconsideration

Pursuant to N.J.A.C. 5:105-2.10, parties may file a request for a reconsideration of any decision rendered by the Council within ten (10) business days following receipt of a Council decision. Requests must be in writing, delivered to the Council and served on all parties. Parties must file any objection to the request for reconsideration within ten (10) business days following receipt of the request. The Council will provide all parties with written notification of its determination regarding the request for reconsideration. N.J.A.C. 5:105-2.10(a) – (e).

In the matter before the Council, the Custodian filed the request for reconsideration of the Council's September 24, 2013 Order on October 4, 2013, three (3) business days prior to the extended time frame to submit same.

Applicable case law holds that:

A party should not seek reconsideration merely based upon dissatisfaction with a decision." D'Atria v. D'Atria, 242 N.J. Super. 392, 401 (Ch. Div. 1990). Rather, reconsideration is reserved for those cases where (1) the decision is based upon a "palpably incorrect or irrational basis;" or (2) it is obvious that the finder of fact did not consider, or failed to appreciate, the significance of probative, competent evidence. *E.g.*, Cummings v. Bahr, 295 N.J. Super. 374, 384 (App. Div. 1996). The moving party must show that the court acted in an arbitrary, capricious or unreasonable manner. D'Atria ... 242 N.J. Super. at 401. "Although it is an overstatement to say that a decision is not arbitrary, capricious, or unreasonable whenever a court can review the reasons stated for the decision without a loud guffaw or involuntary gasp, it is not much of an overstatement." Ibid.

In The Matter Of The Petition Of Comcast Cablevision Of South Jersey, Inc. For A Renewal Certificate Of Approval To Continue To Construct, Operate And Maintain A Cable Television System In The City Of Atlantic City, County Of Atlantic, State Of New Jersey, 2003 N.J. PUC LEXIS 438, 5-6 (N.J. PUC 2003).

As the moving party, the Custodian was required to establish either of the necessary criteria set forth above: either 1) the Council's decision is based upon a "palpably incorrect or irrational basis;" or 2) it is obvious that the Council did not consider the significance of probative, competent evidence. *See* Cummings, 295 N.J. Super. at 384. The Custodian failed to establish that the complaint should be reconsidered based on a mistake. Specifically, in Verry,

GRC 2013-43 *et seq.*, the GRC highlighted what would be deemed a reasonable search and further noted that a custodian is not required to conduct research. *Id.* at 5-6. The Custodian has also failed to show that the Council acted arbitrarily, capriciously or unreasonably. *See D'Atria*, 242 N.J. Super. at 401. Specifically, the Custodian submitted arguments previously presented in the Statement of Information already considered by the Council and provides no new arguments supporting that the GRC made a mistake. Thus, the Custodian's request for reconsideration should be denied. *Cummings*, 295 N.J. Super. at 384; *D'Atria*, 242 N.J. Super. at 401; *Comcast*, 2003 N.J. PUC LEXIS at 5-6. Thus, the Council's September 24, 2013 Interim Order remains in effect and the Custodian must comply with same as ordered.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that the Custodian has failed to establish in his request for reconsideration of the Council's September 24, 2013 Interim Order that either 1) the Council's decision is based upon a "palpably incorrect or irrational basis;" or 2) it is obvious that the Council did not consider the significance of probative, competent evidence. The Custodian failed to establish that the complaint should be reconsidered based on a mistake. Specifically, in *Verry v. Borough of South Bound Brook (Somerset)*, GRC Complaint No. 2013-43 *et seq.*, (September 2013), the GRC highlighted what would be deemed a reasonable search and further noted that a custodian is not required to conduct research. *Id.* at 5-6. The Custodian has also failed to show that the Council acted arbitrarily, capriciously or unreasonably. Specifically, the Custodian submitted arguments previously presented in the Statement of Information already considered by the Council and provides no new arguments supporting that the GRC made a mistake. Thus, the Custodian's request for reconsideration should be denied. *Cummings v. Bahr*, 295 N.J. Super. 374 (App. Div. 1996); *D'Atria v. D'Atria*, 242 N.J. Super. 392 (Ch. Div. 1990); *In The Matter Of The Petition Of Comcast Cablevision Of South Jersey, Inc. For A Renewal Certificate Of Approval To Continue To Construct, Operate And Maintain A Cable Television System In The City Of Atlantic City, County Of Atlantic, State Of New Jersey*, 2003 N.J. PUC LEXIS 438, 5-6 (N.J. PUC 2003). Thus, the Council's September 24, 2013 Interim Order remains in effect and the Custodian must comply with same as ordered.

Prepared By: Frank F. Caruso
Senior Case Manager

Approved By: Brandon D. Minde, Esq.
Executive Director

November 12, 2013



State of New Jersey
GOVERNMENT RECORDS COUNCIL

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PO BOX 819
TRENTON, NJ 08625-0819

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

RICHARD E. CONSTABLE, III
Commissioner

INTERIM ORDER

September 24, 2013 Government Records Council Meeting

Robert A. Verry
Complainant

Complaint Nos. 2013-43 & 2013-53

v.

Borough of South Bound Brook (Somerset)
Custodian of Record

At the September 24, 2013 public meeting, the Government Records Council ("Council") considered the September 17, 2013 Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council, by majority vote adopted the entirety of said findings and recommendations. The Council, therefore, finds that:

1. The Custodian may have failed to bear his burden of proving a lawful denial of access to any responsive records. N.J.S.A. 47:1A-6. Thus, the Custodian shall provide those readily identifiable records that existed at the time of the Complainant's two (2) OPRA requests, if any. If the Custodian believes certain records are exempt from disclosure or that no records exist, the Custodian must legally certify to these facts. The GRC notes that because the time frames contained in the OPRA requests overlap, there is no need for the Custodian to provide the Complainant duplicate copies of records responsive to both requests.
2. **The Custodian shall comply with item No. 1 above within five (5) business days from receipt of the Council's Interim Order with appropriate redactions, including a detailed document index explaining the lawful basis for each redaction, and simultaneously provide certified confirmation of compliance, in accordance with N.J. Court Rule 1:4-4,¹ to the Executive Director.²**
3. The Council defers analysis of whether the Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.
4. The Council defers analysis of whether the Complainant is a prevailing party pending the Custodian's compliance with the Council's Interim Order.

¹ "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."

² Satisfactory compliance requires that the Custodian deliver the record(s) to the Complainant in the requested medium. If a copying or special service charge was incurred by the Complainant, the Custodian must certify that the record has been *made available* to the Complainant but the Custodian may withhold delivery of the record until the financial obligation is satisfied. Any such charge must adhere to the provisions of N.J.S.A. 47:1A-5.

Interim Order Rendered by the
Government Records Council
On The 24th Day of September, 2013

Robin Berg Tabakin, Esq., Chair
Government Records Council

I attest the foregoing is a true and accurate record of the Government Records Council.

Steven Ritardi, Esq., Secretary
Government Records Council

Decision Distribution Date: September 25, 2013

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
September 24, 2013 Council Meeting**

**Robert A. Verry¹
Complainant**

GRC Complaint No. 2013-43 & 2013-53

v.

**Borough of South Bound Brook (Somerset)²
Custodial Agency**

Records Relevant to Complaint:

December 11, 2012 OPRA request: Electronic copies via e-mail of any and all e-mails and/or correspondence between any agent for the Borough of South Bound Brook (“Borough”) including but not limited to Maria Caemmerer, Arleen Lih, Randy Bahr, Francis Linnus, Francesco Taddeo, Mayor Tama Ormosi, Councilpersons Blumenthal, Quinlan, Shoffner, Duh, Dykes and Conner, any police department employee, the Custodian and Joseph Danielsen regarding the Complainant and any variation of his name, including but not limited to nicknames, between January 1, 2012 and December 11, 2012.

February 3, 2013 OPRA request: Electronic copies via e-mail of any and all e-mails and/or correspondence from Joseph Danielsen to any agent for the Borough including but not limited to the Custodian, Maria Caemmerer, Arleen Lih, Randy Bahr, Francis Linnus, Francesco Taddeo, Mayor Tama Ormosi, Councilpersons Blumenthal, Quinlan, Shoffner, Duh, Dykes and Conner, and any police department employee regarding the Complainant and any variation of his name, including but not limited to nicknames, between January 1, 2012 and December 31, 2012.

Custodian of Record: Donald E. Kazar

Request Received by Custodian: December 11, 2012 and February 3, 2013

Response Made by Custodian: December 19, 2012 and February 12, 2013

GRC Complaint Received: February 7, 2013 and February 19, 2013

Background³

Request and Response:

On December 11, 2012, the Complainant submitted an Open Public Records Act

¹ Represented by John A. Bermingham, Jr., Esq. (Mount Bethel, PA).

² Represented by Robert G. Wilson, Esq., of Kovacs & Wilson (Somerville, NJ).

³ The parties may have submitted additional correspondence or made additional statements/assertions in the submissions identified herein. However, the Council includes in the Findings and Recommendations of the Executive Director the submissions necessary and relevant for the adjudication of this complaint.

Robert A. Verry v. Borough of South Bound Brook (Somerset), 2013-43 & 2013-53 – Findings and Recommendations of the Executive Director

("OPRA") request to the Custodian seeking the above-mentioned records. On December 19, 2012, the Custodian responded in writing requesting an extension of time until January 11, 2013 to respond. On January 11, 2013, the Custodian's Counsel responded denying access to the Complainant's OPRA request as overly broad. On February 3, 2013, the Complainant disputed the denial based on the Custodian's previous responses to similar OPRA requests and gave him until February 5, 2013, to disclose responsive records.

On February 3, 2013, the Complainant submitted a second (2nd) OPRA request to the Custodian seeking the above-mentioned records. On February 12, 2013, the Custodian responded in writing denying access to the Complainant's OPRA request as overly broad.

Denial of Access Complaint:

On February 7, 2013, the Complainant filed GRC Complaint No. 2013-43 with the Government Records Council ("GRC"). On February 14, 2013, the Complainant filed GRC Complaint No. 2013-53 with the GRC.

The Complainant disputed the Custodian's denial based on the Custodian's previous responses to four (4) similarly worded OPRA requests for e-mails and correspondence wherein the Custodian responded providing access to records. The Complainant contends that the Custodian's previous responses prove that he did not find those requests invalid and thus should have provided access to the responsive records here. The Complainant further contends that the Custodian's request for an extension of time to locate records responsive to the December 11, 2012 OPRA request further proves that at least that request is valid.

The Complainant requests that the Council: (1) determine that the Custodian violated OPRA by failing to provide the responsive records; (2) order immediate disclosure of same; (3) determine that the Custodian knowingly and willfully violated OPRA under the totality of the circumstances warranting an imposition of civil penalties under N.J.S.A. 47:1A-11; and (4) determine that the Complainant is a prevailing party subject to an award of reasonable attorney's fees.

Statement of Information:

On April 5, 2013, the Custodian filed a Statement of Information ("SOI") for GRC Complaint No. 2013-43. The Custodian certifies that he received the Complainant's first (1st) OPRA request on December 11, 2012 and Counsel responded on January 11, 2013, denying access to the Complainant's OPRA request as overly broad. On April 12, 2013, the Custodian filed an SOI for GRC Complaint No. 2013-53. The Custodian certifies that he received the Complainant's second (2nd) OPRA request on February 3, 2013 and responded on February 12, 2013, denying access to the Complainant's OPRA request as overly broad.

The Custodian contends that the Complainant's OPRA requests were invalid for a number of reasons. The Custodian argues that the requests failed to specifically name all individual senders and recipients. Elcavage v. West Milford Twp. (Passaic), GRC Complaint No. 2009-07 and 2009-08 (April 2010); Wolosky v. Town of Boonton (Morris), GRC Complaint No.

2010-207 (November 2011). The Custodian further argues that, not taking into account any possible non-electronic correspondence, the requests would require the Custodian to search 20 computers for responsive e-mails. Finally, the Custodian argues that the requests require him to determine any possible nicknames used for the Complainant. The Custodian asserts that the Complainant's requests are clearly invalid and would disrupt the Borough's operations.

The Custodian disputes the Complainant's argument that he must disclose records responsive to these requests because he has done so for similar requests in the past. The Custodian contends that a custodian is not obligated to continue to respond to invalid requests just because he has responded to them in the past. The Custodian further asserts that those previous requests were not as broad as the requests at issue here.

Additional Submissions:

On April 26, 2013, the Complainant disputes the SOI and contends that it proves the Custodian knowingly and willfully violated OPRA.

The Complainant asserts that his OPRA requests are consistent with the criteria set forth in Elcavage, GRC 2009-07 and 2009-08. *See also Verry v. Borough of South Bound Brook (Somerset)*, GRC Complaint No. 2011-114 *et seq.* (Interim Order dated May 29, 2012). The Complainant further disputes that the requests at issue here are more overly broad than previous requests for e-mails. The Complainant contends that he included all possible nicknames because he received an e-mail in which he was referred to as "BV" and he did not want the Custodian to deny e-mails that exist because he referred to the Complainant by some unknown nickname. The Complainant contends that if requesting nicknames is invalid, there is nothing to stop a public agency from referring to programs or topics by an irrelevant nickname in order to prevent disclosure. The Complainant contends that to invalidate the term "nicknames" would have severe consequences to the plain language as well as the spirit of OPRA.

The Complainant certifies that the Borough only has 12 computers and not 20 as the Custodian certified. The Complainant contends that even if the Borough had 20 computers, the Custodian does not physically search each computer; rather, he contacts the identified individuals asking them to provide him responsive records. Verry v. Borough of South Bound Brook (Somerset), GRC Complaint No. 2011-385 (Interim Order dated February 26, 2013).⁴

The Complainant also disputes the Custodian's contention that responding to these OPRA requests would have disrupted agency operations. The Complainant contends that the Custodian was able to respond to the previous similarly worded OPRA requests in eleven (11) hours or less while still completing all regular business. The Complainant asserts that this excuse was concocted to support their unlawful denial of access. The Complainant asserts that even if the requests substantially disrupted agency operations, the Custodian could not deny access on this basis without first attempting to reach a reasonable accommodation. N.J.S.A. 47:1A-5(g).

⁴ The Complainant cites to Verry v. Borough of South Bound Brook (Somerset), GRC Complaint No. 2012-22 (March 2013); however, this complaint was administratively disposed of as a duplicate complaint concurrently being adjudicated as GRC Complaint No. 2011-385.

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Analysis⁵

Unlawful Denial of Access

OPRA provides that government records made, maintained, kept on file, or received by a public agency in the course of its official business are subject to public access unless otherwise exempt. N.J.S.A. 47:1A-1.1. A custodian must release all records responsive to an OPRA request “with certain exceptions.” N.J.S.A. 47:1A-1. Additionally, OPRA places the burden on a custodian to prove that a denial of access to records is lawful pursuant to N.J.S.A. 47:1A-6.

The New Jersey Appellate Division has held that:

While OPRA provides an alternative means of access to government documents not otherwise exempted from its reach, *it is not intended as a research tool litigants may use to force government officials to identify and siphon useful information. Rather, OPRA simply operates to make identifiable government records “readily accessible for inspection, copying, or examination.” N.J.S.A. 47:1A-1.*

MAG Entm’t, LLC v. Div. of ABC, 375 N.J. Super. 534, 546 (App. Div. 2005)(emphasis added).

The Court reasoned that:

Most significantly, the request failed to identify with any specificity or particularity the governmental records sought. *MAG provided neither names nor any identifiers other than a broad generic description of a brand or type of case prosecuted by the agency in the past.* Such an open-ended demand required the Division's records custodian to manually search through all of the agency's files, analyze, compile and collate the information contained therein, and identify for MAG the cases relative to its selective enforcement defense in the OAL litigation. Further, once the cases were identified, the records custodian would then be required to evaluate, sort out, and determine the documents to be produced and those otherwise exempted.

Id. at 549 (emphasis added).

The Court further held that “[u]nder OPRA, *agencies are required to disclose only ‘identifiable’ government records* not otherwise exempt ... In short, OPRA does not countenance open-ended searches of an agency's files.” Id. at 549 (emphasis added). Bent v. Stafford Police Dep’t, 381 N.J. Super. 30, 37 (App. Div. 2005);⁶ NJ Builders Assoc. v. NJ Council on Affordable Hous., 390 N.J. Super. 166, 180 (App. Div. 2007); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009).

⁵ There may be other OPRA issues in this matter; however, the Council’s analysis is based solely on the claims made in the Complainant’s Denial of Access Complaint.

⁶ Affirming Bent v. Stafford Police Dep’t, GRC Case No. 2004-78 (October 2004).

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Moreover, the test under MAG is whether a requested record is a specifically identifiable government record. If it is, the record is disclosable barring any exemptions to disclosure contained in OPRA. The Council established criteria deemed necessary to specifically identify an e-mail communication in Sandoval v. NJ State Parole Bd., GRC Complaint No. 2006-167 (Interim Order dated March 28, 2007). In Sandoval, the complainant requested “e-mail ... between [two individuals] from April 1, 2005 through June 23, 2006 [using seventeen (17) different keywords].” The custodian denied the request, claiming that it was overly broad. The Council held that “[t]he Complainant in the complaint now before the GRC requested specific e-mails *by recipient, by date range and by content*. Based on that information, the Custodian has identified [numerous] e-mails which fit the specific recipient and date range criteria Complainant requested.” Id. at 16 (emphasis added).

In Elcavage, GRC 2009-07, the Council examined what constitutes a valid request for e-mails under OPRA. The Council determined that:

In accord with MAG, supra, and its progeny, in order to specifically identify an e-mail, OPRA requests must contain (1) the content and/or subject of the e-mail, (2) the specific date or range of dates during which the e-mail was transmitted or the e-mails were transmitted, and (3) a valid e-mail request must identify the sender and/or the recipient thereof.

Id. at 5 (emphasis in original).

The Council has also applied the criteria set forth in Elcavage to other forms of correspondence, such as letters. See Armenti v. Robbinsville BOE (Mercer), GRC Complaint No. 2009-154 (Interim Order dated May 24, 2011). Moreover, in Verry, GRC 2011-114 *et seq.*, the Council determined that the complainant’s OPRA requests seeking e-mails for a specific time period regarding specific subjects received by the custodian, Mr. Danielsen and Network Blade were valid under Elcavage. The Council thus ordered disclosure of the responsive records.

Here, the Complainant’s OPRA requests are similar to those in Verry. Specifically, the OPRA requests contain the requisite following information necessary for the Custodian to locate and provide records, if any exist: (1) the content and/or subject of the e-mails or correspondence, (2) the specific date or range of dates during which the e-mails or correspondence were transmitted, and (3) identification of the sender and/or the recipient thereof.

To reiterate, a valid OPRA request requires a search, not research. An OPRA request is thus only valid if the subject of the request can be readily identifiable based on the request. Whether a subject can be readily identifiable will need to be made on a case-by-case basis. When it comes to e-mails or documents stored on a computer, a simple keyword search may be sufficient to identify any records that may be responsive to a request. As to correspondence, a custodian may be required to search an appropriate file relevant to the subject. In both cases, e-mails and correspondence, a completed “subject” or “regarding” line may be sufficient to determine whether the record relates to the described subject. Again, what will be sufficient to determine a proper search will depend on how detailed the OPRA request is, and will differ on a case-by-case basis. What a custodian is not required to do, however, is to actually read through

numerous e-mails and correspondence to determine if same is responsive: in other words, conduct research.

Therefore, the Custodian may have failed to bear his burden of proving a lawful denial of access to any responsive records. N.J.S.A. 47:1A-6. Thus, the Custodian shall provide those readily identifiable records that existed at the time of the Complainant's two (2) OPRA requests, if any. If the Custodian believes certain records are exempt from disclosure or that no records exist, the Custodian must legally certify to these facts. The GRC notes that because the time frames contained in the OPRA requests overlap, there is no need for the Custodian to provide the Complainant duplicate copies of records responsive to both requests.

Knowing & Willful

The Council defers analysis of whether the Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.

Prevailing Party Attorney's Fees

The Council defers analysis of whether the Complainant is a prevailing party pending the Custodian's compliance with the Council's Interim Order.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Custodian may have failed to bear his burden of proving a lawful denial of access to any responsive records. N.J.S.A. 47:1A-6. Thus, the Custodian shall provide those readily identifiable records that existed at the time of the Complainant's two (2) OPRA requests, if any. If the Custodian believes certain records are exempt from disclosure or that no records exist, the Custodian must legally certify to these facts. The GRC notes that because the time frames contained in the OPRA requests overlap, there is no need for the Custodian to provide the Complainant duplicate copies of records responsive to both requests.
2. **The Custodian shall comply with item No. 1 above within five (5) business days from receipt of the Council's Interim Order with appropriate redactions, including a detailed document index explaining the lawful basis for each redaction, and simultaneously provide certified confirmation of compliance, in accordance with N.J. Court Rule 1:4-4,⁷ to the Executive Director.⁸**

⁷ "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."

⁸ Satisfactory compliance requires that the Custodian deliver the record(s) to the Complainant in the requested medium. If a copying or special service charge was incurred by the Complainant, the Custodian must certify that the record has been *made available* to the Complainant but the Custodian may withhold delivery of the record until the financial obligation is satisfied. Any such charge must adhere to the provisions of N.J.S.A. 47:1A-5.

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3. The Council defers analysis of whether the Custodian knowingly and willfully violated OPRA and unreasonably denied access under the totality of the circumstances pending the Custodian's compliance with the Council's Interim Order.
4. The Council defers analysis of whether the Complainant is a prevailing party pending the Custodian's compliance with the Council's Interim Order.

Prepared By: Frank F. Caruso
Senior Case Manager

Approved By: Brandon D. Minde, Esq.
Executive Director

September 17, 2013