



State of New Jersey
GOVERNMENT RECORDS COUNCIL

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FINAL DECISION

September 26, 2007 Government Records Council Meeting

Thomas Caggiano
Complainant

Complaint No. 2007-69

v.

NJ Department of Law & Public Safety,
Division of Consumer Affairs
Custodian of Record

At the September 26, 2007 public meeting, the Government Records Council (“Council”) considered the September 19, 2007 Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council voted unanimously to adopt the entirety of said findings and recommendations. The Council, therefore, finds that:

1. Although the Custodian verbally sought clarification from the Complainant on the sixth (6th) business day following receipt of the request, the Custodian failed to respond in writing to the OPRA request within the statutorily mandated seven (7) business days, thus violating N.J.S.A. 47:1A-5.g. and N.J.S.A. 47:1A-5.i. and resulting in a “deemed” denial.
2. Because the Custodian has certified that the extended records inspection contemplated by the Complainant (approximately one week) would substantially disrupt the agency’s operations, and because the Custodian has attempted to reasonably accommodate the Complainant’s request but has been rejected by the Complainant, the Custodian has not unlawfully denied access to the requested records under N.J.S.A. 47:1A-5.c. and N.J.S.A. 47:1A-5.g. The Custodian has borne his burden of proving that the denial of access was authorized by law under N.J.S.A. 47:1A-6 and Vessio v. Barnegat Township Zoning and Building, GRC Complaint No. 2006-70 (April 2007).
3. Because the Custodian attempted to reach several reasonable solutions with the requestor that accommodate the interests of the requestor and the agency pursuant to N.J.S.A. 47:1A-5.g., it is concluded that the Custodian’s actions do not rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances. However, the Custodian’s unlawful deemed denial of access appears negligent



and heedless since he is vested with the legal responsibility of granting and denying access in accordance with the law.

This is the final administrative determination in this matter. Any further review should be pursued in the Appellate Division of the Superior Court of New Jersey within forty-five (45) days. Information about the appeals process can be obtained from the Appellate Division Clerk's Office, Hughes Justice Complex, 25 W. Market St., PO Box 006, Trenton, NJ 08625-0006. Proper service of submissions pursuant to any appeal is to be made to the Council in care of the Executive Director at the State of New Jersey Government Records Council, 101 South Broad Street, PO Box 819, Trenton, NJ 08625-0819.

Final Decision Rendered by the
Government Records Council
On The 26th Day of September, 2007

Vincent P. Maltese, Chairman
Government Records Council

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

David Fleisher, Secretary
Government Records Council

Decision Distribution Date: October 2, 2007

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
September 26, 2007 Council Meeting**

**Thomas Caggiano¹
Complainant**

GRC Complaint No. 2007-69

v.

**NJ Department of Law & Public Safety, Division of Consumer Affairs²
Custodian of Records**

Records Relevant to Complaint: Inspect and examine investigative inquiries and transcripts pertaining to:

1. Peter Snyder, PE
2. Wendell Inghoffer, PE
3. Joseph Sedivy, PE
4. John Cilo, PE
5. Judith Keith, Planner
6. Block 10902 Lots 10 & 12
7. Case No. 05-13
8. Case No. 05-13A
9. Case No. 05-13B
10. Case No. 17
11. Case No. 18
12. Case No. 19³

Request Made: January 17, 2007

Response Made: January 31, 2007⁴ and February 9, 2007

Custodian: Robert J. Campanelli

GRC Complaint Filed: February 10, 2007

Background

January 17, 2007

Complainant's Open Public Records Act ("OPRA") request attached to an official OPRA request form. The Complainant requests the records relevant to this complaint listed above.

¹ No legal representation listed on record.

² DAG Steven Flanzman on behalf of the Attorney General (Newark, NJ).

³ Complainant's request contained multiple pages. Pursuant to a January 31, 2007 clarification conversation between the Custodian and the Complainant, the above listed records were identified.

⁴ Response was verbal.

January 23, 2007

Custodian receives Complainant's OPRA request dated January 17, 2007.

January 31, 2007

Conversation between Complainant and Custodian on the sixth (6th) business day following the Custodian's receipt of the Complainant's OPRA request. The Custodian and the Complainant clarify the Complainant's OPRA request to include the records relevant to this complaint listed above.

February 9, 2007

Custodian's written response to the Complainant's OPRA request. The Custodian responded to the Complainant's OPRA request on the thirteenth (13th) business day following receipt of such request. The Custodian states that the requested records (which were clarified in a conversation on January 31, 2007) are all original, unredacted records and that to ensure the integrity of the records an employee will be required to oversee the Complainant's inspection. The Custodian states that the first two (2) hours of inspection are free of charge, but after such time the Complainant will be required to pay the cost per hour of the employee overseeing the record inspection. The Custodian also states that during such time, if the Complainant requests copies of any pages, he will be charged the copying rates as prescribed in OPRA.

Additionally, the Custodian states that his assistant informed him that during a conversation with the Complainant on February 8, 2007, the Complainant indicated to the Custodian's assistant that he expected to spend an extended period of time reviewing the requested records. The Custodian states that should the Complainant's review take a reasonable period of time, the Custodian can most likely accommodate the request and provide an employee to oversee the records inspection; however the Custodian states that the Division does not have the resources for an extended period of review because the Division is shorthanded. The Custodian also states that in the event the Complainant exceeds a reasonable amount of time for the record inspection, the Complainant will have the option of copying the remaining records at the OPRA copying rates. Further, the Custodian states that the date of February 15, 2007 which the Complainant requested for the record inspection is unavailable. The Custodian requests that the Complainant call to schedule another date.

February 9, 2007

E-mail from Complainant to GRC. The Complainant states that he has received an incorrect response from the NJ Department of Consumer Affairs' OPRA Custodian. The Complainant asserts that he does not have to pay to examine records. The Complainant also states that he does not mind if the Custodian wants someone to oversee him as he inspects the requested records, but states that he will not pay for such oversight.

February 10, 2007

Denial of Access Complaint filed with the Government Records Council ("GRC") with the following attachments:⁵

⁵ Additional records were included with the Complainant's Denial of Access Complaint; however, said records are not relevant to this complaint.

- E-mail from Custodian to Complainant dated February 8, 2007 and
- E-mail from Complainant to GRC dated February 9, 2007.

The Complainant states that he submitted his OPRA request on January 15, 2007 (actual date on the request form is January 17, 2007) and the Custodian denied him access to the requested records on February 9, 2007. The Complainant asserts that the Custodian's response to this request was inappropriate, specifically regarding the fees associated with the inspection of the requested records. The Complainant contends that the Custodian's statement that the Division does not have the resources for an extended review of the requested records even if the Complainant were to pay the employee's hourly rate is not in compliance with OPRA and constitutes a denial of access. The Complainant claims that the examination of records is paid by general tax dollars. The Complainant asserts that such examination is required to determine which records the Complainant desires to have copied because the records were confidential until recently. Additionally, the Complainant contends that the two (2) hour time limit set by the Custodian violates OPRA, which places no limitation on the examination of records or the number of copies desired by a requestor. The Complainant requests that the GRC find that the Custodian has willfully denied access to the requested records. The Complainant also declines mediation of this complaint.

February 22, 2007

Request for the Statement of Information sent to the Custodian.

March 2, 2007

Custodian's Statement of Information ("SOI") with the following attachments:

- Complainant's OPRA request dated January 17, 2007,
- E-mail from Custodian to Complainant dated February 9, 2007 and
- E-mail from Complainant to Custodian dated February 13, 2007.

The Custodian certifies that he received the Complainant's OPRA request dated January 17, 2007 on January 23, 2007. The Custodian certifies that he responded to the Complainant's request on February 9, 2007. The Custodian certifies that the Complainant's request was never denied and that this complaint is without merit.

June 29, 2007

Letter from GRC to Custodian. The GRC requests that the Custodian provide a legal certification in response to the following questions regarding the Complainant's OPRA request which is the subject of this complaint:

1. What was requested?
2. The volume, nature, size, number of government records involved.
3. The period of time over which the records were received.
4. Whether some or all of the records sought are archived or in storage.
5. The amount of time required for a government employee to locate, retrieve and assemble the documents for copying.
6. The amount of time, level, rate and number, if any required to be expended by government employees to monitor the inspection or examination.

7. The amount of time required to return documents to their original storage place.
8. The size of the agency.
9. The number of employees available to accommodate documents requested.
10. The hours of the agency.
11. The availability of information technology and copying capabilities.
12. The level(s) of skill necessary to accommodate the request.
13. The reason(s) that the agency employed, or intends to employ the particular level(s) of skill above.
14. A detailed estimate categorizing the hours needed to identify, copy or prepare for inspection, produce and return the requested documents.
15. Who in the agency will perform the work associated with each request?
16. What attempt has been made to reach a reasonable solution with the requestor to accommodate this request?
17. Does the requestor have any additional pending OPRA requests with the agency?
18. Did the request require the conversion of a record to a specific medium different than that maintained by the agency?
19. In order to fulfill the request, was the custodian required to create records which do not otherwise exist?
20. On what basis is the agency providing the Complainant two (2) hours of inspection free of charge?
21. How many hours of inspection will the agency provide the requestor as a "reasonable amount of time?"
22. On what basis did the agency arise at the number of hours listed above?

July 16, 2007⁶

Letter from Custodian to GRC. The Custodian states that he received the Complainant's OPRA request on January 23, 2007. The Custodian states that the requested records were retrieved and reviewed to determine whether said records were in fact government records and to determine whether any of the requested records required redactions. The Custodian states that the Complainant was initially advised that the records would be copied and provided without any redactions; however, the Custodian also states that the Complainant objected to paying the copying fees and demanded to inspect the requested records. The Custodian states that both he and his assistant had several conversations with the Complainant regarding the Complainant's request to inspect the requested records. The Custodian states that the Complainant informed the Custodian's assistant that he might require a week to inspect the requested records, which the Custodian states consists of approximately seven hundred forty-five (745) pages. The Custodian also states that a substantial number of said pages are records which the Complainant himself submitted to the State Board of Professional Engineers and Land Surveyors.

Additionally, the Custodian states that because the requested records are original records, any inspection of such records would have to be conducted in the presence of a Division employee so as to maintain the integrity of the records. The Custodian states that because the Complainant has submitted threatening and harassing correspondence to

⁶ Additional correspondence was submitted by the parties; however, said correspondence is either not relevant to this complaint or restates the facts/assertions already presented to the GRC.
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the Division targeted at State Board of Professional Engineers members and the Acting Director of the Division, it would also be necessary to have a member of the NJ State Police present during any inspection. (The Custodian attaches copies of correspondence sent from the Complainant to the Division to illustrate this point).

The Custodian asserts that the Division's position is that any extended inspection by the Complainant would create a substantial disruption to agency operations and that it is not reasonable for the Division to provide an employee and a Police Officer for a week to allow the Complainant to inspect records. The Custodian contends that the Division does not have the employee resources to provide someone to oversee the Complainant's record inspection for a week. The Custodian states that he offered to provide the Complainant with an employee to oversee the inspection for two (2) hours free of charge. The Custodian further states that he also offered the Complainant a reasonable amount of time to continue the record inspection, which the Custodian states would be at most one (1) business day. The Custodian contends that the Complainant would be required to bear the expenses of the employee's time.

The Custodian also states that on a previous occasion when the Complainant was in the building for a reason other than an OPRA request, the Complainant attempted to wander the building and enter individual offices unannounced. The Custodian contends that the Complainant is a security risk, thus necessitating a police presence during the Complainant's inspection.

Further, the Custodian asserts that the offer he provided the Complainant is consistent with the mandates of OPRA. The Custodian states that he remains willing to copy all records and provide such to the Complainant upon payment of the copy fees prescribed under OPRA.

Analysis

Whether the Custodian unlawfully denied access to the requested records?

OPRA provides that:

“...government records shall be readily accessible for inspection, copying, or examination by the citizens of this State, *with certain exceptions...*” (Emphasis added.) N.J.S.A. 47:1A-1.

Additionally, OPRA defines a government record as:

“... any paper, written or printed book, document, drawing, map, plan, photograph, microfilm, data processed or image processed document, information stored or maintained electronically or by sound-recording or in a similar device, or any copy thereof, that has been *made, maintained or kept on file ... or that has been received* in the course of his or its official business ...” (Emphasis added.) N.J.S.A. 47:1A-1.1.

OPRA provides that:

“[w]henever the nature, format, manner of collation, or volume of a government record embodied in the form of printed matter to be inspected, examined...pursuant to this section is such that the record...involves an extraordinary expenditure of time and effort to accommodate the request, the public agency may charge, in addition to the actual cost of duplicating the record, a special service charge that shall be reasonable and shall be based upon the actual direct cost of providing the copy or copies...The requestor shall have the opportunity to review and object to the charge prior to it being incurred. (Emphasis added). N.J.S.A. 47:1A-5.c.

OPRA provides that:

“[a] request for access to a government record shall be in writing and hand-delivered, mailed, transmitted electronically, or otherwise conveyed to the appropriate custodian....If a request for access to a government record would substantially disrupt agency operations, the custodian may deny access to the record after attempting to reach a reasonable solution with the requestor that accommodates the interests of the requestor and the agency.” (Emphasis added). N.J.S.A. 47:1A-5.g.

OPRA also provides that:

“...a custodian of a government record shall grant access to a government record or deny access to a government record as soon as possible, but not later than seven business days after receiving the request, provided that the record is currently available and not in storage or archived....” (Emphasis added). N.J.S.A. 47:1A-5.i.

OPRA places the onus on the Custodian to prove that a denial of access is lawful. Specifically, OPRA states:

“...[t]he public agency shall have the burden of proving that the denial of access is authorized by law...” N.J.S.A. 47:1A-6.

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. 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.

Pursuant to N.J.S.A. 47:1A-5.g. if a custodian is unable to fulfill the OPRA request, the custodian is required to promptly return the OPRA request form to the requestor with a written explanation as to why the records are unavailable. OPRA also provides that a custodian must grant or deny access to a government record as soon as possible but not later than seven (7) business days after receiving the request. N.J.S.A. 47:1A-5.i.

In this complaint, the Custodian certifies receiving the Complainant's request on January 23, 2007 and clarifying the Complainant's request during a conversation on January 31, 2007, six (6) business days following receipt of such request. However, the Custodian did not provide the Complainant with a written response granting access to the requested records until February 9, 2007, the thirteenth (13th) business day following receipt of said complaint.

In Akbar Na'im v. Essex County Correctional Facility, GRC Complaint No. 2006-170 (May 2007), the Council held that:

“[b]ecause the Deputy Director of Essex County Correctional Facility failed to grant access, deny access, seek clarification or request an extension of time to respond to the Complainant's request within the statutorily mandated seven (7) business days, Deputy Director 'Keith Ali' (now retired) of Essex County Correctional Facility is in violation of N.J.S.A. 47:1A-5.g. and N.J.S.A. 47:1A-5.i.”

Additionally, if the Custodian required additional time beyond the seven (7) business day time period required by OPRA in order to satisfy the Complainant's request, the Custodian should have obtained a written agreement from the Complainant in order to do so. In John Paff v. Bergen County Prosecutor's Office, GRC Complaint No. 2005-115 (March 2006), the Custodian knew he needed additional time in order to respond to the Complainant's request, but failed to obtain a written agreement from the Complainant extending the seven (7) business day time frame required under OPRA to respond. The Council held that the Custodian's failure to obtain a written agreement extending the seven (7) business day time period resulted in a “deemed” denial of the request.

Therefore, although the Custodian verbally sought clarification from the Complainant on the sixth (6th) business day following receipt of the request, the Custodian failed to respond in writing to the OPRA request within the statutorily mandated seven (7) business days, thus violating N.J.S.A. 47:1A-5.g. and N.J.S.A. 47:1A-5.i. and resulting in a “deemed” denial.

Further, the Complainant objects to the Custodian's two (2) hour time limit for the inspection of the requested records and also objects to the Custodian's charge of an employee's hourly rate to oversee the Complainant's inspection of records beyond the two (2) hours offered.

The Custodian certifies that the requested records are all original, unredacted records and that to ensure the integrity of the records, an employee will be required to oversee the Complainant's inspection. The Custodian states that because the Complainant has submitted threatening and harassing correspondence to the Division, targeted at Board members and the Acting Director of the Division, it would also be necessary to have a member of the NJ State Police present during any inspection.

Administrative agencies, in general, have broad discretion in selecting the appropriate method and process for fulfilling their statutory responsibilities. In Re Adoption of 2003 Low Income Housing Tax Credit, 369 N.J. Super 2, 44 (App.Div.

2004); In re Request for Solid Waste Util. Cust. Lists, 106 N.J. 508, 519 (1987). Specifically, under OPRA, a custodian has the discretion in developing processes so that he or she can best meet his or her obligations under OPRA. For example, a custodian has the discretion to customize an OPRA request form (so long as the items listed in N.J.S.A. 47:1A-5.f.1-7 are included). Where a custodian believes that the safety, integrity or confidentiality of a document requested pursuant to OPRA may be compromised, or where the custodian has concerns regarding the impact that inspection, examination, or copying of a record or records might have upon any aspect of the operations of the custodian's office, a custodian may, consistent with OPRA, place reasonable limitations upon a requestor's access to such record or records. See Moore v. The Board of Chosen Freeholders of the County of Mercer, 39 N.J. 26 (1962) (finding that plaintiffs were not permitted to copy records on their personal copiers because doing so would risk damaging the records); Libertarian Party of Central New Jersey v. Murphy, 384 N.J. Super. 136, 141 (App. Div. 2006)(a municipality may insist upon using its own diskette, rather than allowing the requesting party to supply the diskette, in order to avoid the possibility that the municipality's computer system may be compromised by any outside party in copying Township Council meeting minutes from Township computers); Janet Hascup v. Waldwick Board of Education, GRC Complaint No. 2005-192 (April 2007)(a custodian did not violate OPRA when he prohibited a complainant from using a personal photocopier to copy public records because he had safety and energy concerns regarding the complainant's use of a personal photocopier).

Additionally, OPRA permits a custodian to deny access to a record if a request for access to a government record would substantially disrupt agency operations and if an attempt to reach a reasonable accommodation between the agency and the requestor cannot be reached. N.J.S.A. 47:1A-5.g. The Custodian certifies that the Division does not have the resources for an extended period of review because the Division is shorthanded. An extended review as contemplated by the Complainant (for approximately a week) would substantially disrupt agency operations by requiring the extended attendance of a Division of Consumer Affairs employee and a NJ State Police Officer at the Complainant's inspection of the requested records.

The Custodian has reasonably offered to provide the Complainant with copies of all the records responsive upon payment of the statutory copying rates, which the Complainant has declined. The Custodian has also reasonably offered the Complainant two (2) hours to inspect the seven hundred forty-five (745) pages responsive to the Complainant's request, of which the Custodian states a substantial portion are records which the Complainant himself submitted to the Division. Additionally, the Custodian has reasonably offered to accommodate the Complainant's request by charging a special service charge for the hourly rate of a Division of Consumer Affairs employee to monitor the Complainant's inspection of the requested records in the event that said inspection exceeds two (2) hours. Further, the Custodian has reasonably offered to copy the remaining records at the OPRA copying costs in the event the Complainant exceeds a reasonable amount of time for the record inspection, which the Custodian states is one (1) business day. However, the Complainant objects to paying any inspection fees, as well as a two (2) hour inspection time limit.

The GRC has previously held that a charge for inspection of records is appropriate in certain circumstances. In Robert Vessio v. Barnegat Township Zoning and Building, GRC Complaint No. 2006-70 (April 2007) the Council upheld the Custodian's charge of \$400.00 to retrieve one hundred eighty-five (185) storage boxes for the Complainant's inspection.

In this complaint before the Council, the Complainant's request consisted of seven hundred forty-five (745) responsive records. Based on the Council's decision in Vessio, the Custodian is not improper in charging the Complainant for the inspection of the Complainant's voluminous request.

Because the Custodian has certified that the extended records inspection contemplated by the Complainant (approximately one week) would substantially disrupt the agency's operations, and because the Custodian has made numerous attempts to reasonably accommodate the Complainant's request but has been rejected by the Complainant, the Custodian has not unlawfully denied access to the requested record under N.J.S.A. 47:1A-5.c. and N.J.S.A. 47:1A-5.g. The Custodian has borne his burden of proving that the denial of access was authorized by law under N.J.S.A. 47:1A-6 and Vessio v. Barnegat Township Zoning and Building.

Whether the Custodian's delay in access to the requested records rises to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances?

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:

"... If 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 at 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 (*Berg*); 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 (App. Div. 1996) at 107).

In this complaint, the Custodian's failure to grant access to the Complainant's request within the statutorily mandated seven (7) business days is a violation of N.J.S.A. 47:1A-5.g. and N.J.S.A. 47:1A-5.i. resulting in a "deemed" denial. Ultimately, the Custodian granted the Complainant access to the requested records on the thirteenth (13th) business day following receipt of said request.

Because the Custodian attempted to reach several reasonable solutions with the requestor that accommodate the interests of the requestor and the agency pursuant to N.J.S.A. 47:1A-5.g., it is concluded that the Custodian's actions do not rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances. However, the Custodian's unlawful deemed denial of access appears negligent and heedless since he is vested with the legal responsibility of granting and denying access in accordance with the law.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. Although the Custodian verbally sought clarification from the Complainant on the sixth (6th) business day following receipt of the request, the Custodian failed to respond in writing to the OPRA request within the statutorily mandated seven (7) business days, thus violating N.J.S.A. 47:1A-5.g. and N.J.S.A. 47:1A-5.i. and resulting in a "deemed" denial.
2. Because the Custodian has certified that the extended records inspection contemplated by the Complainant (approximately one week) would substantially disrupt the agency's operations, and because the Custodian has attempted to reasonably accommodate the Complainant's request but has been rejected by the Complainant, the Custodian has not unlawfully denied access to the requested records under N.J.S.A. 47:1A-5.c. and N.J.S.A. 47:1A-5.g. The Custodian has borne his burden of proving that the denial of access was authorized by law under N.J.S.A. 47:1A-6 and Vessio v. Barnegat Township Zoning and Building, GRC Complaint No. 2006-70 (April 2007).
3. Because the Custodian attempted to reach several reasonable solutions with the requestor that accommodate the interests of the requestor and the agency pursuant to N.J.S.A. 47:1A-5.g., it is concluded that the Custodian's actions do not rise to the level of a knowing and willful violation of OPRA and unreasonable denial of access under the totality of the circumstances. However, the Custodian's unlawful deemed denial of access appears negligent and heedless since he is vested with the legal responsibility of granting and denying access in accordance with the law.

Prepared By:

Dara Lownie
Senior Case Manager

Approved By:

Catherine Starghill, Esq.
Executive Director

September 19, 2007