



**NEW JERSEY GOVERNMENT RECORDS COUNCIL**  
**Administrative Complaint Disposition – No Correspondence Received By the Custodian**

**Robert Kovacs**  
**Complainant**

**GRC Complaint No. 2015-263**

v.

**Essex County Department of Corrections**  
**Custodial Agency**

**Custodian of Record:** Michael Venezia  
**Request Received by Custodian:** N/A  
**GRC Complaint Received:** August 18, 2015

**Complaint Disposition:** The Custodian certifies that he did not receive a records request, dated June 20, 2015, from the Complainant. Additionally, the Complainant failed to provide any evidence to contradict the Custodian's certification. Therefore, the complaint is without any reasonable factual basis to pursue.

**Applicable OPRA Provision:** "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." N.J.S.A. 47:1A-5(g).

"The council shall make a determination as to whether the complaint is within its jurisdiction or frivolous or *without any reasonable factual basis*." N.J.S.A. 47:1A-7(e) (emphasis added).

**Effective Date of Disposition:** December 15, 2015<sup>1</sup>

Prepared By: Samuel A. Rosado  
Staff Attorney

Reviewed By: Joseph D. Glover  
Executive Director

Date: December 8, 2015

**Distribution Date: December 16, 2015**

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<sup>1</sup> This complaint was prepared for adjudication at the Council's November 17, 2015 meeting, but could not be adjudicated due to lack of quorum.