



State of New Jersey  
DEPARTMENT OF COMMUNITY AFFAIRS  
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PHILIP D. MURPHY  
Governor

LT. GOVERNOR SHEILA Y. OLIVER  
Commissioner

**FINAL DECISION**

**November 10, 2020 Government Records Council Meeting**

John Arena  
Complainant

Complaint No. 2019-47

v.

Essex County Sheriff's Office  
Custodian of Record

At the November 10, 2020 public meeting, the Government Records Council ("Council") considered the October 27, 2020 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. The Custodian's written response was legally insufficient because she failed to respond to each item contained in the Complainant's OPRA request. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i); Paff v. Willingboro Bd. of Educ. (Burlington), GRC Complaint No. 2007-272 (May 2008). See also Lenchitz v. Pittsgrove Twp. (Salem), GRC Complaint No. 2012-265 (Interim Order dated August 27, 2013).
2. The Custodian has borne her burden of proof that she lawfully denied access to the Complainant's OPRA request item No. 1 seeking the 2017 COPS grant application. Specifically, the Custodian certified in the Statement of Information, and the record reflects, that no responsive records exist. N.J.S.A. 47:1A-6; see Pusterhofer v. N.J. Dep't of Educ., GRC Complaint No. 2005-49 (July 2005).
3. The Complainant's request No. 3 seeking "any and all reports" is invalid because it required research. The Custodian had no legal duty to research her files, or cause research, to locate records potentially responsive to the request. MAG Entm't, LLC v. Div. of ABC, 375 N.J. Super. 534, 549 (App. Div. 2005); Bent v. Stafford Twp. Police Dep't, 381 N.J. Super. 30, 37 (App. Div. 2005); N.J. Builders Ass'n v. N.J. Council on Affordable Hous., 390 N.J. Super. 166, 180 (App. Div. 2007); Lagerkvist v. Office of the Governor, 443 N.J. Super. 230, 236-237 (App. Div. 2015); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009); Donato v. Twp. of Union, GRC Complaint No. 2005-182 (February 2007); Valdes v. Union City Bd. of Educ. (Hudson), GRC Complaint Nos. 2011-147, 2011-157, 2011-172, and 2011-181 (July 2012). Thus, the Custodian lawfully denied access to the subject request item. N.J.S.A. 47:1A-6.
4. The Custodian's response was insufficient because she failed to address each individual OPRA request item. N.J.S.A. 47:1A-5(g). However, the Custodian lawfully denied

access to OPRA request item No. 1 because no records exist. Further, the Custodian lawfully denied access to request item No. 3 because same was invalid. Additionally, the evidence of record does not indicate that the Custodian's violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, 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.

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 10<sup>th</sup> Day of November 2020

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 13, 2020**

**STATE OF NEW JERSEY  
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director  
November 10, 2020 Council Meeting**

**John Arena<sup>1</sup>  
Complainant**

**GRC Complaint No. 2019-47**

v.

**Essex County Sheriff's Office<sup>2</sup>  
Custodial Agency**

**Records Relevant to Complaint:** Electronic copies via e-mail of:<sup>3</sup>

1. Grant application that the Essex County Sheriff's Office ("ECSO") sent to the U.S. Department of Justice ("USDOJ") for a 2017 "Community Oriented Policing Services" ("COPS") grant, which resulted in a \$1,875,000 grant award.
2. Agreement between the ECSO and USDOJ regarding the 2017 COPS grant award.
3. "Any and all reports" filed by ECSO to the USDOJ as a condition of the 2017 COPS grant award.

**Custodian of Record:** Valentina Smoot Palchetti  
**Request Received by Custodian:** November 27, 2018  
**Response Made by Custodian:** December 11, 2018  
**GRC Complaint Received:** March 1, 2019

**Background<sup>4</sup>**

**Request and Response:**

On November 27, 2018, the Complainant submitted an Open Public Records Act ("OPRA") request to the Custodian seeking the above-mentioned records. On December 11, 2018, the Custodian responded in writing disclosing multiple records via e-mail. On the same day, the Complainant responded advising that it appeared that some ECSO records sought were not attached. The Custodian responded in writing noting that she separated the request into two (2) parts representing the two (2) departments from which records were sought. The Custodian noted that she would respond on behalf of the ECSO, but she has yet to receive a response from them.

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<sup>1</sup> No legal representation listed on record.

<sup>2</sup> Represented by Courtney Gaccione, Esq. (Newark, NJ).

<sup>3</sup> The Complainant sought additional records that are not at issue in this complaint.

<sup>4</sup> 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.

On December 19, 2018, the Complainant sought a status update regarding his outstanding OPRA request items. On January 11, 2019, the Custodian responded via e-mail stating that she reached out to the ECSO and would advise the Complainant of their response.

Denial of Access Complaint:

On March 1, 2019, the Complainant filed a Denial of Access Complaint with the Government Records Council (“GRC”). The Complainant asserted that the Custodian failed to respond to the subject OPRA request items. The Complainant noted that he sought updates on the status of these items on two occasions, but never received a formal response from the Custodian.

Supplemental Response:

On March 19, 2019, the Custodian responded in writing. The Custodian stated that regarding OPRA request item No. 1, the ECSO tried to download a copy of the COPS application from the New Jersey Department of Justice (“NJDOJ”) website but were unsuccessful. The Custodian stated that because ECSO did not retain a copy of their online submission done directly through the NJDOJ’s website, no record existed.

The Custodian stated that regarding OPRA request item No. 2, she was disclosing a copy of the award documents. The Custodian further stated that regarding item No. 3, ECSO informed her that they had to file a variety of reports in connection of the grant. The Custodian thus stated that the Complainant would need to be more specific as to those reports sought based on the verbiage contained within the disclosed award documents.

Statement of Information:

On April 2, 2019, the Custodian filed a Statement of Information (“SOI”). The Custodian certified that she received the Complainant’s OPRA request on November 27, 2018. The Custodian certified that her search included relying on the ECSO to search USDOJ’s website and their paper records to obtain any record responsive to the subject OPRA request. The Custodian noted that ESCO could not access the application via the internet and did not retain a copy. The Custodian also affirmed that the ECSO confirmed that potentially responsive reports could be accessed from “the various websites they are uploaded to.” The Custodian certified that she reached out to the ECSO in writing four (4) times to obtain an update on their search. The Custodian noted that she also requested updates via telephone and Essex County’s (“County”) OPRA Portal sent daily reminders to ECSO’s OPRA liaison. The Custodian certified that on March 19, 2019, she met with the ECSO’s Deputy Chief, wherein she received the agreement, an explanation on why the application could not be provided, and the reasons why OPRA request item No. 3 was invalid. The Custodian certified that she ultimately provided a formal response to the Complainant on March 19, 2019.

The Custodian acknowledged that “it is obvious” that the County failed to timely respond to the subject OPRA request. N.J.S.A. 47:1A-5. The Complainant averred that she nonetheless responded that no record responsive to OPRA request item No. 1 existed. The Custodian further averred that she disclosed the agreement responsive to OPRA request item No. 2 in its entirety.

The Custodian argued that had she been able to respond to OPRA request item No. 3 within the statutory time frame, she would likely have sought clarification. The Custodian noted that pages 5 through 12 of the agreement identified reports that were required to be filed over the last five (5) years on three (3) separate websites. The Custodian further noted that the reports covered financial data, criminal proceedings, civil proceedings, and administrative proceedings. The Custodian contended that the complex level of reporting rendered OPRA request item No. 3 invalid. Bent v. Stafford Twp. Police Dep't, 381 N.J. Super. 30 (App. Div. 2005); Hersh v. Lakewood Bd. of Educ. (Ocean), GRC Complaint No. 2010-291 (August 2012). The Custodian argued that the ECSO would have been required to conduct research over three (3) websites without the benefit of a report type or time frame within which to focus their search.

### Analysis

#### Sufficiency of Response

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. In Paff v. Willingboro Bd. of Educ. (Burlington), GRC Complaint No. 2007-272 (May 2008), the Council held that “. . . [t]he Custodian’s response was legally insufficient because he failed to respond to each request item individually. Therefore, the Custodian has violated N.J.S.A. 47:1A-5(g).” See also Lenchitz v. Pittsgrove Twp. (Salem), GRC Complaint No. 2012-265 (Interim Order dated August 27, 2013).

Here, the Custodian originally responded disclosing multiple records. In response, the Complainant identified at least three (3) items that the Custodian did not address. The Custodian responded advising that she would follow up with the Complainant once she received a response from the ECSO. However, this supplemental response did not occur until over three (3) months later, and after both the Complainant’s attempt to obtain a status update and his filing of the instant complaint.<sup>5</sup> Thus, the evidence of record supports that the Custodian’s initial response to this OPRA request were insufficient in accordance with Paff, GRC 2007-272.

As such, the Custodian’s written response was legally insufficient because she failed to respond to each item contained in the Complainant’s OPRA request. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i); Paff, GRC 2007-272. See also Lenchitz, 2012-265.

#### 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.

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<sup>5</sup> Therein, the Custodian denied OPRA request item No. 1 because no records existed and sought clarification in response to OPRA request item No. 3. Both issues will be addressed below. The GRC notes that it need not address OPRA request item No. 2 because the Custodian disclosed a copy of the Award document on March 19, 2019, which included the agreement between the ECSO and USDOJ.

The Council has previously found that, where a custodian certified that no responsive records exist, no unlawful denial of access occurred. See Pusterhofer v. N.J. Dep't of Educ., GRC Complaint No. 2005-49 (July 2005). In the matter before the Council, the Complainant's OPRA request item No. 1 sought access to ECSO's grant application for the 2017 COPs grant. The Custodian responding, albeit following the filing of this complaint, advising that the ECSO did not maintain a copy of the grant submission completed online through NJDOJ's website. The Custodian thus stated that no records exist. The Custodian also certified to this fact in the SOI and no evidence contradicts this certification. Thus, the GRC is persuaded that the Custodian lawfully denied access to the requested grant application.

Accordingly, the Custodian has borne her burden of proof that she lawfully denied access to the Complainants' OPRA request item No. 1 seeking the 2017 COPS grant application. Specifically, the Custodian certified in the SOI, and the record reflects, that no responsive records exist. N.J.S.A. 47:1A-6; see Pusterhofer, GRC 2005-49.

### **Validity of Request**

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. (emphasis added). Bent v. Stafford Twp. Police

Dep't, 381 N.J. Super. 30, 37 (App. Div. 2005),<sup>6</sup> N.J. Builders Ass'n. v. N.J. Council on Affordable Hous., 390 N.J. Super. 166, 178-179 (App. Div. 2007); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009).

The validity of an OPRA request typically falls into three (3) categories. The first is a request that is overly broad (“any and all,” requests seeking “records” generically, *etc.*) because it fails to identify specific records, thus requiring a custodian to conduct research. MAG, 375 N.J. Super. 534; Donato, GRC 2005-182. The second is those requests seeking information or asking questions. See *e.g.* Rummel v. Cumberland Cnty. Bd. of Chosen Freeholders, GRC Complaint No. 2011-168 (December 2012). The final category is a request that is either not on an official OPRA request form or does not invoke OPRA. See *e.g.* Naples v. N.J. Motor Vehicle Comm'n, GRC Complaint No. 2008-97 (December 2008).

In Donato v. Twp. of Union, GRC Complaint No. 2005-182 (February 2007), the Council held that pursuant to MAG, a custodian is obligated to search his or her files to find identifiable government records listed in a requestor’s OPRA request. The complainant in Donato requested all motor vehicle accident reports from September 5, 2005 to September 15, 2005. The custodian sought clarification of said request on the basis that it was not specific enough. The Council stated that:

Pursuant to [MAG], the Custodian is obligated to search her files to find the identifiable government records listed in the Complainant’s OPRA request (all motor vehicle accident reports for the period of September 5, 2005 through September 15, 2005). However, the Custodian is not required to research her files to figure out which records, if any, might be responsive to a broad or unclear OPRA request. The word search is defined as “to go or look through carefully in order to find something missing or lost.” The word research, on the other hand, means “a close and careful study to find new facts or information.” (Footnotes omitted.)

[Id.]

Further, there are instances where a request can be specific enough to induce research, thus rendering it invalid. For instance, in Valdes v. Union City Bd. of Educ. (Hudson), GRC Complaint Nos. 2011-147, 2011-157, 2011-172, and 2011-181 (July 2012), the complainant submitted four (4) OPRA requests seeking copies of meeting minutes containing motions to approve other minutes. The Council, citing Taylor v. Cherry Hill Bd. of Educ. (Camden), GRC Complaint No. 2008-258 (August 2009) and Ray v. Freedom Academy Charter Sch. (Camden), GRC Complaint No. 2009-185 (August 2010), determined that the requests were overly broad:

[S]aid requests do not specify the date or time frame of the minutes sought. Rather, the requests seek those minutes at which the UCBOE motioned to approve meeting minutes for four (4) other meetings. Similar to the facts of both Taylor and Ray, the requests herein *seek minutes that refer to a topic and would require the Custodian to research the UCBOE’s meeting minutes in order to locate the particular sets of minutes that are responsive to the Complainant’s requests . . .* because the

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<sup>6</sup> Affirmed on appeal regarding Bent v. Stafford Police Department, GRC Case No. 2004-78 (October 2004).

Complainant's four (4) requests for minutes "that include a motion made by the Union City Board of Education to approve the minutes" from other meetings fail to identify the specific dates of the minutes sought and would require the Custodian to conduct research in order to locate the responsive records, the Complainant's requests are invalid under OPRA.

[Valdes, GRC 2011-147, *et seq.* (emphasis added) (citing N.J. Builders Ass'n, 390 N.J. Super. at 180; Bent, 381 N.J. Super. 30 (App. Div. 2005); MAG, 375 N.J. Super. at 546; Schuler, GRC 2007-151; Donato, GRC 2005-182. See also Valdes v. Gov't Records Council, GRC Complaint No. 2013-278 (September 2014)).]

In Lagerkvist v. Office of the Governor, 443 N.J. Super. 230, 236-237 (App. Div. 2015), the court's rational of what amounted to research supports the Council's decision in Valdes. There, the court reasoned that the plaintiff's request:

. . . would have had to make a preliminary determination as to which travel records correlated to the governor and to his senior officials, past and present, over a span of years. The custodian would then have had to attempt to single out those which were third-party funded events. Next, he would have had to collect all documents corresponding to those events and search to ensure he had accumulated everything, including both paper and electronic correspondence. OPRA does not convert a custodian into a researcher.

[Id. at 237. See also Carter v. N.J. Dep't of Cmty. Affairs, Div. of Local Gov't Serv., 2019 N.J. Super. Unpub LEXIS 2510 (App. Div. Dec. 10, 2019) (affirming Carter, GRC Complaint No. 2016-262 (August 2018)).]

Here, the Complainant's OPRA request item No. 3 sought "any and all reports" filed by ECSO to the USDOJ "as a condition of the" 2017 COPS grant. The Custodian responded in writing on March 19, 2019 stating that the ECSO filed many reports in connection with the grant and that the Complainant would need to identify a type. Thereafter, the Custodian argued in the SOI that reports required to be filed are covered over several pages of the Award document. The Custodian certified that those reports covering a five (5) year period were required to be filed across three (3) different websites and cover a wide array of different information. The Custodian further asserted that the complexity of these reports rendered the request especially overbroad. The Custodian also noted that aside from the lack of report type, the Complainant's failure to include a specific time frame increased the difficulty in locating responsive reports.

In reviewing the request, Award document, and the Custodians argument, the GRC is persuaded that the subject request item was invalid because it would have required the Custodian to conduct research to locate records. First and foremost, the Award speaks to multiple reporting requirements in various scenarios but does not indicate with specificity the names or types of reports required. The Complainant's request item requires the Custodian to review and interpret those reports required per the COPS grant and then attempt to locate same through those systems wherein they are meant to be reported. Much like the requests at issue in Lagerkvist and Valdes,



request item No. 3 here inherently requires the type of research that is not contemplated under OPRA.

Accordingly, the Complainant's request No. 3 seeking "any and all reports" is invalid because it required research. The Custodian had no legal duty to research her files, or cause research, to locate records potentially responsive to the request. MAG, 375 N.J. Super. at 546; Bent, 381 N.J. Super. at 37; N.J. Builders, 390 N.J. Super. at 180; Lagerkvist, 443 N.J. Super. at 236-237; Schuler, GRC 2007-151; Donato, GRC 2005-182; Valdes, GRC 2011-147, *et seq.* Thus, the Custodian lawfully denied access to the subject request item. N.J.S.A. 47:1A-6.

### **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)).

In the matter before the Council, the Custodian's response was insufficient because she failed to address each individual OPRA request item. N.J.S.A. 47:1A-5(g). However, the Custodian lawfully denied access to OPRA request item No. 1 because no records exist. Further, the Custodian lawfully denied access to request item No. 3 because same was invalid. Additionally, the evidence of record does not indicate that the Custodian's violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, 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.

## Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Custodian's written response was legally insufficient because she failed to respond to each item contained in the Complainant's OPRA request. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i); Paff v. Willingboro Bd. of Educ. (Burlington), GRC Complaint No. 2007-272 (May 2008). See also Lenchitz v. Pittsgrove Twp. (Salem), GRC Complaint No. 2012-265 (Interim Order dated August 27, 2013).
2. The Custodian has borne her burden of proof that she lawfully denied access to the Complainants' OPRA request item No. 1 seeking the 2017 COPS grant application. Specifically, the Custodian certified in the Statement of Information, and the record reflects, that no responsive records exist. N.J.S.A. 47:1A-6; see Pusterhofer v. N.J. Dep't of Educ., GRC Complaint No. 2005-49 (July 2005).
3. The Complainant's request No. 3 seeking "any and all reports" is invalid because it required research. The Custodian had no legal duty to research her files, or cause research, to locate records potentially responsive to the request. MAG Entm't, LLC v. Div. of ABC, 375 N.J. Super. 534, 549 (App. Div. 2005); Bent v. Stafford Twp. Police Dep't, 381 N.J. Super. 30, 37 (App. Div. 2005); N.J. Builders Ass'n v. N.J. Council on Affordable Hous., 390 N.J. Super. 166, 180 (App. Div. 2007); Lagerkvist v. Office of the Governor, 443 N.J. Super. 230, 236-237 (App. Div. 2015); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009); Donato v. Twp. of Union, GRC Complaint No. 2005-182 (February 2007); Valdes v. Union City Bd. of Educ. (Hudson), GRC Complaint Nos. 2011-147, 2011-157, 2011-172, and 2011-181 (July 2012). Thus, the Custodian lawfully denied access to the subject request item. N.J.S.A. 47:1A-6.
4. The Custodian's response was insufficient because she failed to address each individual OPRA request item. N.J.S.A. 47:1A-5(g). However, the Custodian lawfully denied access to OPRA request item No. 1 because no records exist. Further, the Custodian lawfully denied access to request item No. 3 because same was invalid. Additionally, the evidence of record does not indicate that the Custodian's violation of OPRA had a positive element of conscious wrongdoing or was intentional and deliberate. Therefore, 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.

Prepared By: Frank F. Caruso  
Executive Director

October 27, 2020