



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

LT. GOVERNOR SHEILA Y. OLIVER
Commissioner

FINAL DECISION

February 22, 2022 Government Records Council Meeting

Benjamin George (Hollingshead)
Complainant

Complaint No. 2021-34

v.

Township of Winslow (Camden)
Custodian of Record

At the February 22, 2022 public meeting, the Government Records Council (“Council”) considered the February 15, 2022 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 did not bear her burden of proof that she timely responded to the Complainant’s OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian’s failure to respond in writing to the Complainant’s OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days results in a “deemed” denial of the Complainant’s OPRA request pursuant to N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i), and Kelley v. Twp. of Rockaway, GRC Complaint No. 2007-11 (Interim Order October 31, 2007).
2. The Complainant’s November 30, 2020 request seeking “documentation” regarding himself, the identity of “the current guardian,” file numbers and “wet ink signatures, and/or . . . autographs” is invalid because it failed to identify a specific record and seeks information that clearly required research. MAG Entm’t, LLC v. Div. of ABC, 375 N.J. Super. 534, 546 (App. Div. 2005); Bent v. Stafford 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); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009); Feiler-Jampel v. Somerset Cnty. Prosecutor’s Office, GRC Complaint No. 2007-190 (Interim Order dated March 26, 2008). See also Lagerkvist v. Office of the Governor, 443 N.J. Super. 230, 236-237 (App. Div. 2015). Thus, the Custodian lawfully denied access to the Complainant’s request. N.J.S.A. 47:1A-6. Because the Complainant’s request is invalid, and because it is clear he did not seek access to a “birth certificate,” the GRC declines to address with Executive Order No. 18 (Gov. McGreevey, 2002) applies here.
3. The Custodian’s failure to respond in a timely manner resulted in a “deemed” denial of access. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i). However, the Complainant’s request is invalid because it failed to identify the specific records sought and sought information. 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 22nd Day of February 2022

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: February 24, 2022

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
February 22, 2022 Council Meeting**

**Benjamin George (Hollingshead)¹
Complainant**

GRC Complaint No. 2021-34

v.

**Township of Winslow (Camden)²
Custodial Agency**

Records Relevant to Complaint: Electronic copies via e-mail of:

1. “[D]ocumentation in regards to the creation of any trust(s), of any type, and amendment(s) of such trust(s) aforementioned, and deed(s), of any subject matter, created for the benefit of [the Complainant], during the years 1967, 1968, and 1969, as styled using the Gregorian calendar style of dating, in regards to . . .” four (4) different arrangements of the Complainant’s name.
2. “[T]he identity of the current guardian . . . the file number(s) of the guardian file(s), and the name(s) and official capacity title(s) of current custodian(s), and the original jurisdiction(s) custodian(s) . . . wet ink signature(s), and/or wet ink autograph (s), or copies of copies (sic) of such, which contained none, one, or more of the list of proper names [contained herein], signed, and/or autographed during the years of 1968, and 1969, as styled using the Gregorian calendar style of dating, which enable, or facilitated the creation of a [N.J. Dep’t of Health] CERTIFICATE OF LIVE BIRTH. . .”

Custodian of Record: Lisa Dority

Request Received by Custodian: December 7, 2020

Response Made by Custodian: January 13, 2021

GRC Complaint Received: February 4, 2021

Background³

Request and Response:

On November 30, 2020, the Complainant submitted an Open Public Records Act (“OPRA”) request to the Custodian seeking the above-mentioned records. On December 9, 2020, the Complainant e-mailed Registrar of Vital Statistics Carolyn Chaykin clarifying his request

¹ No legal representation listed on record.

² Represented by Stuart A. Platt, Esq., of The Platt Law Group, P.C. (Stratford, 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.

multiple times to include five (5) potential dates for the documents sought, noting that the search needed to locate them may be different “depending on the jurisdiction,” and including that the records may be found under letters corresponding with “HollingsHead,” Benjamin George, or his parent’s names. The Complainant further noted that he was seeking the “original, very first, account documents, for which, in the future, ‘certificates’ attesting to the validity of the records may be issued.” The Complainant argued that he believed two (2) sets of records existed and that he sought those that predated the “creation of any uttered ‘certificates’ in relation to the ‘record of birth,’” and led to the “issuance of the ‘certificates.’”

On January 7, 2021, the Complainant e-mailed Ms. Chaykin seeking a status update on his OPRA request. On the same day, Ms. Chaykin responded stating that she was attempting to clarify with the State Registrar’s Office an issue regarding multiple dates on a birth certificate. Ms. Chaykin noted that should the Complainant prefer, she could issue another birth certificate with a single date on it and asked him to advise accordingly.

On January 12, 2021, the Complainant e-mailed Ms. Chaykin stating that he did not wish to obtain a new birth certificate, but instead was attempting to determine if any documentary evidence of the date anomaly existed. On the same day, the Complainant e-mailed the Custodian seeking a status update on his OPRA request noting that the statutory time frame had expired. The Complainant stated that he was providing three (3) additional business days for the Custodian to respond to the subject OPRA request.

On January 13, 2021, the Custodian responded in writing stating that the Township of Winslow (“Township”) did not maintain any guardianship records, but that the Complainant may wish to contact the Camden County Surrogate’s Office for assistance. The Custodian further denied access to a birth certificate in accordance with Executive Order No. 18 (Gov. McGreevey, 2002) (“EO 18”). The Custodian also noted that she is aware the Township Registrar “diligently tried to assist” the Complainant since July 30, 2020. The Custodian thus recommended that the Complainant contact the State Registrar’s Office for further assistance.

On January 15, 2021, the Complainant e-mailed the Custodian and Ms. Chaykin appearing to dispute the response and asking that they identify whether the documents sought exist.

Denial of Access Complaint:

On February 4, 2021, the Complainant filed a Denial of Access Complaint with the Government Records Council (“GRC”). The Complainant contended that the Custodian failed to fulfill her OPRA obligation based on a failure to adhere to the statutory time frame. The Complainant noted that he advised Ms. Chaykin that she could seek an extension; however, no such extension request occurred.

The Complainant further contended that EO 18 did not apply to him. The Complainant asserted that he did not seek a “‘certified’ copy” of his birth certificate; rather, he sought “‘certification’ (copies) of the very first records where someone tells the parents to ‘sign here’.” The Complainant contended that it is these records that the Custodian failed to either disclose or confirm that they did not exist. The Complainant also contended that the Custodian failed to

identify whether any “wet ink signatures/autographs” and “trust(s) . . . and deed(s)” existed. The Complainant questioned whether this silence was akin to a response that no records exist.⁴

Statement of Information:

On February 24, 2021, the Custodian filed a Statement of Information (“SOI”). The Custodian certified that she received the Complainant’s OPRA request on December 7, 2020. The Custodian affirmed that she did not perform a search because the subject OPRA request was improper. The Custodian certified that she responded in writing on January 13, 2021 stating that no guardianship records existed and that the birth certificate was exempt under EO 18.

The Custodian certified that the Township did not maintain any guardianship records. The Custodian further contended that she lawfully denied access to the Complainant’s birth certificate under EO 18. The Custodian stated that EO 18 set forth the process by which an individual can obtain access to a vital record, including a required specific form. The Custodian further noted that the GRC has already held that it had no authority to address the vital statistics request process. See Mayer v. Twp. of Middle (Cape May), GRC Complaint No. 2008-167 (February 2009). The Custodian thus contended that her denial was appropriate under N.J.S.A. 47:1A-9.

Analysis

Timeliness

OPRA mandates that a custodian must either grant or deny access to requested records within seven (7) business days from receipt of said request. N.J.S.A. 47:1A-5(i). A custodian’s failure to respond within the required seven (7) business days results in a “deemed” denial. Id. Further, a custodian’s response, either granting or denying access, must be in writing pursuant to N.J.S.A. 47:1A-5(g).⁵ Thus, a custodian’s failure to respond in writing to a complainant’s OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days results in a “deemed” denial of the complainant’s OPRA request pursuant to N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i), and Kelley v. Twp. of Rockaway, GRC Complaint No. 2007-11 (Interim Order October 31, 2007).

Here, the Complainant submitted his OPRA request on November 30, 2020, but subsequently clarified it on December 9, 2020. After several communications between the Complainant and Ms. Chaykin early in January 2021, the Custodian responded in writing on January 13, 2021 stating that no guardianship records existed and denying access to a birth certificate under EO 18. This complaint followed, wherein the Complainant contended that the Custodian failed to timely respond to his OPRA request. In the SOI, the Custodian certified that she received the subject OPRA request on December 7, 2020 and did not respond until January

⁴ The Complainant advanced additional arguments regarding the alleged assignment of a “surname” by the Custodian and other common law issues. However, the GRC will not address these issues as it has no authority over same. N.J.S.A. 47:1A-7(b); see also Rowan, Jr. v. Warren Hills Reg’l Sch. Dist. (Warren), GRC Complaint No. 2011-347 (January 2013).

⁵ A custodian’s written response either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days, even if said response is not on the agency’s official OPRA request form, is a valid response pursuant to OPRA.

13, 2021, or twenty-five (25) business days after receipt of the subject OPRA request. Even when calculating the response time frame after the Complainant's December 9, 2020 clarification, same is still twenty-three (23) business days after receipt of same. Thus, the facts here support that a "deemed" denial of access occurred.

Therefore, the Custodian did not bear her burden of proof that she timely responded to the Complainant's OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian's failure to respond in writing to the Complainant's OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days results in a "deemed" denial of the Complainant's OPRA request pursuant to N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i), and Kelley, GRC 2007-11.

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 Police Dep't, 381 N.J. Super. 30, 37 (App. Div. 2005);⁶ N.J. Builders Ass'n v. N.J. Council on Affordable Hous.,

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

390 N.J. Super. 166, 180 (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.*) and requires a custodian to conduct research. MAG, 375 N.J. Super. 534; Donato v. Twp. of Union, GRC Complaint No. 2005-182 (January 2007). 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).

Regarding generic requests for “records,” the request at issue in MAG sought “all documents or records evidencing that the ABC sought, obtained or ordered revocation of a liquor license for the charge of selling alcoholic beverages to an intoxicated person in which such person, after leaving the licensed premises, was involved in a fatal auto accident” and “all documents or records evidencing that the ABC sought, obtained or ordered suspension of a liquor license exceeding 45 days for charges of lewd or immoral activity.” Id. at 539-540. The court noted that plaintiffs failed to include additional identifiers such as a case name or docket number. *See also* Steinhauer-Kula v. Twp. of Downe (Cumberland), GRC Complaint No. 2010-198 (March 2012) (holding that the complainant’s request item No. 2 seeking “[p]roof of submission” was invalid); Edwards v. Hous. Auth. of Plainfield (Union), GRC Complaint No. 2008-183 *et seq.* (Final Decision dated April 25, 2012) (accepting the Administrative Law Judge’s finding that a newspaper article attached to a subject OPRA request that was related to the records sought did not cure the deficiencies present in the request) Id. at 12-13.

Moreover, in Feiler-Jampel v. Somerset Cnty. Prosecutor’s Office, GRC Complaint No. 2007-190 (Interim Order dated March 26, 2008), the Council similarly held that a request seeking “[a]ny and all documents and evidence” relating to an investigation being conducted by the Somerset County Prosecutor’s Office was invalid, reasoning that:

[B]ecause the records requested comprise an entire SCPO file, the request is overbroad and of the nature of a blanket request for a class of various documents rather than a request for specific government records. Because OPRA does not require custodians to research files to discern which records may be responsive to a request, the Custodian had no legal duty to research the SCPO files to locate records potentially responsive to the Complainant’s request pursuant to the Superior Court’s decisions in [MAG], [Bent] and the Council’s decisions in Asarnow v. Department of Labor and Workforce Development, GRC Complaint No. 2006-24 (May 2006) and Morgano v. Essex Cnty. Prosecutor’s Office, GRC Complaint No. 2007-190 (February 2008).

[Id. *See also* Schulz v. NJ State Police, GRC Complaint No. 2014-390 (Interim Order dated July 28, 2015) (holding that the portion of the request seeking “all documents” was overly broad and thus invalid).]

Additionally, in Lagerkvist v. Office of the Governor, 443 N.J. Super. 230, 236-237 (App. Div. 2015), the court held that plaintiff's request was invalid because it required research. In reaching this conclusion, the court reasoned that:

The custodian in this case 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.]

Here, the Complainant's November 30, 2020 request sought "documentation" regarding himself, the identity of "the current guardian," file numbers and "wet ink signatures, and/or . . . autographs." The Complainant later attempted to clarify his request on December 9, 2020 in a series of e-mails wherein he appears to seek access to certain "documents" or "records" that form the basis of a "record of birth." Over the next month, Ms. Chaykin assisted the Complainant in trying to cure an issue with a "birth certificate" on file for the Complainant. However, the Custodian subsequently denied access to the request under EO 18 because she believed the Complainant sought a vital statistic record not disclosable under OPRA. The Custodian also noted that the Township did not maintain guardianship records.

The Complainant subsequently filed this complaint, wherein he argued that he was not seeking a certified birth certificate. The Complainant argued that instead, he sought records that ultimately formed the basis for the existence of the birth certificate. The Complainant also contended that the Custodian failed to address guardianship or "wet ink" records but questioned whether this failure was the Custodian's way of advising that no records existed. In the SOI, the Custodian argued that she lawfully denied access to the request under EO 18. See Mayer, GRC 2008-167.

Upon review of the submissions here, and notwithstanding the Custodian's denial, the GRC is persuaded that this request is invalid. First, a plain reading of the request supports that it fails to identify any specific records. Rather, the request sought generic documentation and information regarding his birth that allegedly formed the basis for a "certified birth certificate" which requires a custodian to conduct research to fulfill. Specifically, the Custodian would have had to first determine whether there existed a documentation process for births that preceded the creation of an official certificate. The Custodian would have then had to determine if the Township ever received or maintained such a record. Finally, the Custodian would then have to research the Township's vital records to determine if any existed for the names identified by the Complainant over multiple dates. As such, the request is invalid under OPRA in accordance with Lagerkvist, 443 N.J. Super. at 236-237.

Further, the Complainant's attempts to clarify the request further confused the Township to the point where Ms. Chaykin made multiple attempts to engage the Complainant about

correcting the birth certificate issue before the Custodian ultimately denied access to a copy of it under EO 18. This obvious confusion only supports that the Township could never identify the “documentation” to which the Complainant referred in his request. Thus, in accordance with MAG and Feiler-Jampel, the Custodian lawfully denied access to the instant OPRA request.

Accordingly, the Complainant’s November 30, 2020 request seeking “documentation” regarding himself, the identity of “the current guardian,” file numbers and “wet ink signatures, and/or . . . autographs” is invalid because it failed to identify a specific record and seeks information that clearly required research. MAG, 375 N.J. Super. at 546; Bent, 381 N.J. Super. at 37, N.J. Builders Ass’n, 390 N.J. Super. at 180; Schuler, GRC 2007-151; Feiler-Jampel, GRC 2007-190. See also Lagerkvist, 443 N.J. Super. at 236-237. Thus, the Custodian lawfully denied access to the Complainant’s request. N.J.S.A. 47:1A-6. Because the Complainant’s request is invalid, and because it is clear he did not seek access to a “birth certificate,” the GRC declines to address with EO 18 applies here.

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 failure to respond in a timely manner resulted in a “deemed” denial of access. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i). However, the Complainant’s request is invalid because it failed to identify the specific records sought and sought information. 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 did not bear her burden of proof that she timely responded to the Complainant's OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian's failure to respond in writing to the Complainant's OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days results in a "deemed" denial of the Complainant's OPRA request pursuant to N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i), and Kelley v. Twp. of Rockaway, GRC Complaint No. 2007-11 (Interim Order October 31, 2007).
2. The Complainant's November 30, 2020 request seeking "documentation" regarding himself, the identity of "the current guardian," file numbers and "wet ink signatures, and/or . . . autographs" is invalid because it failed to identify a specific record and seeks information that clearly required research. MAG Entm't, LLC v. Div. of ABC, 375 N.J. Super. 534, 546 (App. Div. 2005); Bent v. Stafford 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); Schuler v. Borough of Bloomsbury, GRC Complaint No. 2007-151 (February 2009); Feiler-Jampel v. Somerset Cnty. Prosecutor's Office, GRC Complaint No. 2007-190 (Interim Order dated March 26, 2008). See also Lagerkvist v. Office of the Governor, 443 N.J. Super. 230, 236-237 (App. Div. 2015). Thus, the Custodian lawfully denied access to the Complainant's request. N.J.S.A. 47:1A-6. Because the Complainant's request is invalid, and because it is clear he did not seek access to a "birth certificate," the GRC declines to address with Executive Order No. 18 (Gov. McGreevey, 2002) applies here.
3. The Custodian's failure to respond in a timely manner resulted in a "deemed" denial of access. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i). However, the Complainant's request is invalid because it failed to identify the specific records sought and sought information. 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

February 15, 2022