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State of New Jersey
DEPARTMENT OF COMMUNITY AFFAIRS
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JACQUELYN A. SUÁREZ
Commissioner

FINAL DECISION

July 29, 2025 Government Records Council Meeting

Rotimi Owoh, Esq. (o/b/o African American
Data & Research Institute & Baffi Obafemi)
Complainant

Complaint No. 2022-175

v.
City of Northfield Police Department (Atlantic)
Custodian of Record

At the July 29, 2025, public meeting, the Government Records Council (“Council”) considered the July 22, 2025, Supplemental 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 unlawfully denied access to the Complainant’s OPRA request seeking cancelled checks related to settlement agreements for discrimination or harassment claims against the City of Northfield. N.J.S.A. 47:1A-6; Burnett v. Cnty. of Gloucester, 415 N.J. Super. 506, 517 (App. Div. 2010); Libertarians for Transparent Gov’t v. Borough of Westwood (Bergen), GRC Complaint No. 2016-214 (Interim Order dated October 30, 2018). The Custodian shall locate and retrieve the records from its insurance carrier and provide same to the Complainant. Should no responsive records exist, the Custodian shall certify to same.
2. **The Custodian shall comply with conclusion No. 1 above within twenty (20) business days from receipt of the Council’s Final Decision. In the circumstances where the records ordered for disclosure are not provided to the Complainant, the Council’s Final Decision may be enforced in the Superior Court of New Jersey. N.J. Court Rules, R. 4:67-6; N.J.A.C. 5:105-2.9(c).**
3. The Custodian has borne her burden of demonstrating a “colorable claim” of privacy for an individual’s date of birth who was alleged of but not charge with a crime. Brennan v. Bergen Cnty. Prosecutor’s Office, 233 N.J. 330, 342 (2018). Further, upon balancing the Custodian’s reasons for redacting the individual’s date of birth with the Complainant’s need for access, the factors outlined in Burnett v. Cnty. of Bergen, 198 N.J. 408, 427 (2009) weigh in favor of non-disclosure. Thus, the Custodian lawfully denied access since disclosure would violate the individual’s reasonable expectation of privacy. N.J.S.A. 47:1A-6; N.J.S.A. 47:1A-1.
4. 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, 432 (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, 76 (2008). Specifically, the Custodian was obligated to retrieve copies of the request records from the third party maintaining them on the City's behalf. 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. at 432, and Mason, 196 N.J. at 76. **Based on this determination, the parties shall confer in an effort to decide the amount of reasonable attorney's fees to be paid to Complainant within twenty (20) business days. The parties shall promptly notify the GRC in writing if a fee agreement is reached. If the parties cannot agree on the amount of attorney's fees, Complainant's Counsel shall submit a fee application to the Council in accordance with N.J.A.C. 5:105-2.13(c).**

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 29th Day of July, 2025

John A. Alexy, 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: July 31, 2025

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
July 29, 2025 Council Meeting**

**Rotimi Owoh, Esq. (on Behalf of African American
Data & Research Institute & Baffi Obafemi)¹
Complainant**

GRC Complaint No. 2022-175

v.

**City of Northfield Police Department (Atlantic)²
Custodial Agency**

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

1. Copies of cancelled checks and invoices used for settlement agreements for discrimination and or harassment from 2014 to the present.
2. Copy of complaints relating to use of “N-word” or any other racial or derogatory slur within the police department or any other department from 2014 to present.
 - a. Gender, race and or sexual orientation.
 - b. Note that this request includes allegations that were substantiated and or unsubstantiated.³

Custodian of Record: Mary Canesi

Request Received by Custodian: March 16, 2022

Response Made by Custodian: March 25, 2022; April 4, 2022

GRC Complaint Received: May 9, 2022

Background⁴

Request and Response:

On March 16, 2022, the Complainant submitted an Open Public Records Act (“OPRA”) request to the Custodian seeking the above-mentioned records. On March 25, 2022, the Custodian responded to item No. 1 of the Complainant’s request, stating no responsive records exist, as they were payments made by the City of Northfield’s (“City”) insurance carrier, and are not created, kept, or maintained by the City. On April 4, 2022, the Custodian responded to the Complainant’s OPRA request providing three (3) pages of records pertaining to an incident in which a civilian

¹ The Complainant represents the African American Data & Research Institute and Baffi Obafemi.

² Represented by Edward J. Buzak, Esq. of The Buzak Law Group, LLC (Montville, NJ).

³ The Complainant sought other records not at issue in this complaint.

⁴ 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.

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claimed another civilian used a racial slur against them. The Custodian stated the birth date of the alleged subject was redacted under OPRA's privacy exemption.

Denial of Access Complaint:

On May 9, 2022, the Complainant filed a Denial of Access Complaint with the Government Records Council ("GRC"). The Complainant asserted the Custodian violated OPRA by failing to obtain copies of the cancelled checks from the City's insurance company. The Complainant next asserted the Custodian's redaction of the alleged subject's birth date was not protected against disclosure under OPRA.

The Complainant requested the GRC compel the City to fully comply with the OPRA request and to award counsel fees.⁵

Statement of Information:

On August 23, 2022, the Custodian filed a Statement of Information ("SOI"). The Custodian certified that the City received the Complainant's OPRA request on March 16, 2022, and that she reviewed the City's files and could not locate copies of any relevant checks, including within the City's accounts payable system. The Custodian further certified she responded to the Complainant in writing on March 25, 2022, and on April 4, 2022, stating that no responsive records exist for item No. 1, and provided records responsive to item No. 2.

The Custodian asserted the Complainant sought cancelled checks and invoices pertaining to lawsuits against the City for alleged discrimination. The Custodian maintained that the City did not possess these records as they did not pay the settlements directly. The Custodian argued its insurer directly paid the plaintiffs in those lawsuits with no involvement from the City.

Regarding the complaint, the Custodian asserted that no charges were filed after an investigation by the police department. The Custodian therefore argued the accused did not lose his right to privacy because he allegedly made a slur that was never substantiated. The Custodian asserted that providing the date of birth would be an invasion of the accused's privacy.

Additional Submissions:

On May 21, 2025, the GRC requested the parties complete a questionnaire based on privacy interest factors established by Burnett v. Cnty. of Bergen, 198 N.J. 408, 427 (2009) (citing Doe v. Poritz, 142 N.J. 1 (1995)). On May 23, 2021, the Custodian submitted the following responses to the questionnaire:

⁵ The Complainant further noted that access to the records should have been granted under the "common law 'right to access public records.'" However, the GRC does not have the authority to address a requestor's common law right to access records. N.J.S.A. 47:1A-7(b); Rowan, Jr. v. Warren Hills Reg'l Sch. Dist. (Warren), GRC Complaint No. 2011-347 (January 2013); Kelly v. N.J. Dep't of Transp., GRC Complaint No. 2010-215 (November 2011). Thus, the GRC cannot address any common law right of access to the requested records.

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1. The type of record(s) requested.

Response: Copy of complaints relating to use of the “N-Word” or any other racial or derogatory slur within the police department or any other department from 2014 to present.

2. The information the requested records do or might contain.

Response: The date of birth of an individual against whom an allegation was made by a private citizen, but which did not result in the filing of any charges at the County or municipal levels, nor did the private citizen pursuant a private citizen complaint.

3. The potential harm in any subsequent non-consensual disclosure of the requested records.

Response: The non-consensual disclosure of a date of birth can create risks of identity theft and/or fraud.

4. The injury from disclosure to the relationship in which the requested record was generated.

Response: Not entirely sure what this question means. In an effort to be responsive, the non-consensual disclosure of a date of birth can create risks of identity theft and/or fraud.

5. The adequacy of safeguards to prevent unauthorized disclosure.

Response: Records are individually reviewed carefully on a case-by-case basis to prevent improper disclosure.

6. Whether there is an express statutory mandate, articulated public policy or other recognized public interest militating toward access.

Response: I am unaware of any mandate or public policy, articulated or otherwise that leans in favor of disclosing the date of birth of a person who has not been charged with a crime and has only been accused of same on an unsubstantiated basis.

The Complainant did not submit a response to the GRC’s questionnaire.

Analysis

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.

Cancelled Checks and Invoices

In Burnett v. Cnty. of Gloucester, 415 N.J. Super. 506, 517 (App. Div. 2010), the court determined that the defendant was required to obtain settlement agreements from its insurance broker. The court's decision largely fell on the fact that there was no question that the broker was working on behalf of the defendants to execute settlement agreements. Id. at 513. The court noted it previously held that while insurance brokers or outside counsel are third parties, "they nonetheless bind the county as principle, and the agreements are made on its behalf." Id. In determining that defendants had an obligation to obtain responsive records from the insurance broker, the court noted the "circumstances presented in [Bent v. Township of Stafford Police Department] to be far removed from those existing in the present matter." Id. at 516-17.⁶

In Libertarians for Transparent Gov't v. Borough of Westwood (Bergen), GRC Complaint No. 2016-214 (Interim Order dated October 30, 2018), the complainant requested records pertaining to a civil suit. The custodian denied access, stating the suit was handled by the joint insurance fund ("fund") on the municipality's behalf and directed the complainant to submit an OPRA request directly. The Council found that while the fund was a public agency, the municipality's relationship with the fund was the same as with private insurers or outside counsel. The Council held the custodian therefore had an obligation to obtain the records from the fund in accordance with Burnett.

In the instant matter, the Custodian argued that the City did not make or maintain the responsive records, stating their insurer paid out via the terms of the settlements. The Custodian asserted they were not involved in the process at all.

However, the relationship between the City and its insurance carrier remains the same as those in Burnett and Libertarians. Specifically, the insurance carrier created and issued the checks on behalf of the City as part of its obligation to provide the City with services such as legal defense. Similarly, the court in Burnett held that records created by counsel were on behalf of the custodian, notwithstanding that counsel was retained and provided by the custodian's insurer, rather than the custodian directly. 415 N.J. Super. at 513. Thus, the Custodian was obligated to retrieve the checks regardless of whether the City was directly involved in the process.

Therefore, the Custodian unlawfully denied access to the Complainant's OPRA request seeking cancelled checks related to settlement agreements for discrimination or harassment claims against the City. N.J.S.A. 47:1A-6; Burnett, 415 N.J. Super. at 517; Libertarians, GRC 2016-214. The Custodian shall locate and retrieve the records from its insurance carrier and provide same to the Complainant. Should no responsive records exist, the Custodian shall certify to same.

DOB Redaction

OPRA provides that "a public agency has a responsibility and an obligation to safeguard from public access a citizen's personal information with which it has been entrusted when disclosure thereof would violate the citizen's reasonable expectation of privacy" N.J.S.A.

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

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47:1A-1. The Supreme Court has explained that N.J.S.A. 47:1A-1's safeguard against disclosure of personal information is substantive and requires "a balancing test that weighs both the public's strong interest in disclosure with the need to safeguard from public access personal information that would violate a reasonable expectation of privacy." Burnett, 198 N.J. at 422-23, 427 (2009) (citing Doe, 142 N.J. 1).

However, in Brennan v. Bergen Cnty. Prosecutor's Office, 233 N.J. 330, 342 (2018), the Court held that before applying the balancing test, "a custodian must present a colorable claim that public access to the records requested would invade a person's objectively reasonable expectation of privacy." The Court found that if the custodian failed to show a "colorable claim" of privacy then "there is no need to resort to the Doe factors." Id. Therefore, the GRC must initially determine if the custodian passed the initial threshold of presenting a "colorable claim" of privacy, before moving forward with the balancing test.

Upon review, the GRC does find the Custodian has made a colorable claim of privacy. In the instant scenario, while there was an investigation into a possible crime, the Custodian certified that no charges were filed against the individual. Under N.J.S.A. 47:1A-3(b), certain personal information of citizens is subject to disclosure when concerning a criminal investigation. That information includes a defendant's name, age, residence, occupation, marital status and similar background information. However, this information is to be made available only when 1) "a crime has been reported" and 2) "an arrest has been made." Id. Therefore, it is reasonable for an individual who was accused of but not charged with a crime to expect that their personal information would not be publicized.

Now that a colorable claim has been met, the GRC can move forward with the balancing test. See Brennan, 233 N.J. at 342. In Herron v. New Jersey Dep't of Educ., GRC Complaint No. 2018-126 (June 2020), the complainant requested college transcripts of a public employee. When the GRC requested the parties complete the privacy interest questionnaire, only the custodian provided a response. Because the complainant failed to provide any response expressing the need for the transcripts, the GRC weighed in favor of non-disclosure. See also Smith v. New Jersey Dep't of Banking & Ins., GRC Complaint No. 2014-301 (March 2015).

In the instant matter, the GRC requested the parties complete the balancing test questionnaire. However, only the Custodian provided a response, arguing that release of the DOB increased the risk of identity theft or fraud. The Complainant's failure to respond leaves the GRC incapable of knowing why the Complainant needed that information or if the Complainant intended to redistribute the information. The GRC notes that the Complainant was given the individual's name and address thus disclosure of the individual's DOB would heighten the risk of illegal misuse of his information.

Therefore, the Custodian has borne her burden of demonstrating a "colorable claim" of privacy for an individual's DOB who was alleged of but not charge with a crime. Brennan, 233 N.J. at 342. Further, upon balancing the Custodian's reasons for redacting the individual's DOB with the Complainant's need for access, the factors outlined in Burnett weigh in favor of non-disclosure. Thus, the Custodian lawfully denied access since disclosure would violate the individual's reasonable expectation of privacy. N.J.S.A. 47:1A-6; N.J.S.A. 47:1A-1.

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 Appellate Division 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, 71 (2008), the 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” (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 held that the phrase “prevailing party” is a legal term of art that refers to a “party in whose favor a judgment is rendered.” Id. at 603 (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. Further, the Supreme Court expressed 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.

[196 N.J. at 73-76.]

The Court 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, New Jersey v. Singer, 469 U.S. 832 (1984).

[Id. at 76.]

Here, the Complainant sought in part “cancelled checks” related to settlement agreements made in complaints of discrimination or harassment. In response, the Custodian stated that no responsive records exist since the checks were processed and delivered by the City’s insurance carrier, with no involvement from the City. The Complainant then filed the instant complaint on May 9, 2025, asserting the Custodian failed to retrieve copies of the checks from the insurance carrier.

In determining whether the Custodian is a prevailing party entitled to attorneys’ fees, the GRC is satisfied that the evidence of record supports a conclusion in the affirmative. Because the insurance carrier created and delivered those checks on behalf of the City, the Custodian was obligated to retrieve copies of the requested records from the insurance carrier. Thus, a causal nexus exists between this complaint and the change in the Custodian’s conduct. Id. at 76. Accordingly, the Complainant is a prevailing party entitled to attorney fees.⁷

Therefore, 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. at 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. at 76. Specifically, the Custodian was obligated to retrieve copies of the request records from the third party maintaining

⁷ The Council makes this determination with the understanding that the Complainant acted on behalf of a bona fide client at the time of the request. Although the Complainant’s status as representing an actual client has been previously challenged, the available evidence on the record is insufficient to address that issue herein. See Owoh, Esq. (O.B.O. AADARI) v. Neptune City Police Dep’t (Monmouth), GRC Complaint No. 2018-153 (April 2020) and Owoh, Esq. (O.B.O. AADARI) v. Freehold Twp. Police Dep’t (Monmouth), GRC Complaint No. 2018-155 (Interim Order dated September 29, 2020).

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them on the City's behalf. 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. at 432, and Mason, 196 N.J. at 76. Based on this determination, the parties shall confer in an effort to decide the amount of reasonable attorney's fees to be paid to Complainant within twenty (20) business days. The parties shall promptly notify the GRC in writing if a fee agreement is reached. If the parties cannot agree on the amount of attorney's fees, Complainant's Counsel shall submit a fee application to the Council in accordance with N.J.A.C. 5:105-2.13(c).

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Custodian unlawfully denied access to the Complainant's OPRA request seeking cancelled checks related to settlement agreements for discrimination or harassment claims against the City of Northfield. N.J.S.A. 47:1A-6; Burnett v. Cnty. of Gloucester, 415 N.J. Super. 506, 517 (App. Div. 2010); Libertarians for Transparent Gov't v. Borough of Westwood (Bergen), GRC Complaint No. 2016-214 (Interim Order dated October 30, 2018). The Custodian shall locate and retrieve the records from its insurance carrier and provide same to the Complainant. Should no responsive records exist, the Custodian shall certify to same.
2. **The Custodian shall comply with conclusion No. 1 above within twenty (20) business days from receipt of the Council's Final Decision. In the circumstances where the records ordered for disclosure are not provided to the Complainant, the Council's Final Decision may be enforced in the Superior Court of New Jersey. N.J. Court Rules, R. 4:67-6; N.J.A.C. 5:105-2.9(c).**
3. The Custodian has borne her burden of demonstrating a "colorable claim" of privacy for an individual's date of birth who was alleged of but not charge with a crime. Brennan v. Bergen Cnty. Prosecutor's Office, 233 N.J. 330, 342 (2018). Further, upon balancing the Custodian's reasons for redacting the individual's date of birth with the Complainant's need for access, the factors outlined in Burnett v. Cnty. of Bergen, 198 N.J. 408, 427 (2009) weigh in favor of non-disclosure. Thus, the Custodian lawfully denied access since disclosure would violate the individual's reasonable expectation of privacy. N.J.S.A. 47:1A-6; N.J.S.A. 47:1A-1.
4. 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, 432 (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, 76 (2008). Specifically, the Custodian was obligated to retrieve copies of the request records from the third party maintaining them on the City's behalf. 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. at 432, and Mason, 196 N.J. at 76. Based on this determination, the parties shall confer in an effort to

decide the amount of reasonable attorney's fees to be paid to Complainant within twenty (20) business days. The parties shall promptly notify the GRC in writing if a fee agreement is reached. If the parties cannot agree on the amount of attorney's fees, Complainant's Counsel shall submit a fee application to the Council in accordance with N.J.A.C. 5:105-2.13(c).

Prepared By: Samuel A. Rosado
Senior Staff Attorney

July 22, 2025