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

## FINAL DECISION

### August 26, 2025 Government Records Council Meeting

Anne Vukicevich  
Complainant

Complaint No. 2022-251

v.

Moorestown Township (Burlington)  
Custodian of Record

At the August 26, 2025, public meeting, the Government Records Council (“Council”) considered the August 19, 2025, 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. No “deemed” denial of access occurred here because, notwithstanding the unnotified GovPilot delivery failure issue, the Custodian timely responded in writing, applicable to the March 25, 2022 OPRA request, within the statutory timeframe providing all responsive records. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i); Anonymous v. Borough of Haledon (Passaic), GRC Complaint No. 2022-222 (October 2023).
2. The Complainant’s March 4, 2022 is invalid because it fails to identify a specific record and would require the Custodian to perform research and make subjective determinations. MAG Entm’t, LLC v. Div. of Alcoholic Beverage Control, 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); 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). Thus, the Custodian lawfully denied this request. N.J.S.A. 47:1A-6. Further, the Custodian’s efforts to accommodate the Complainant’s request did not cure the validity issue. See Ciszewski v. Newton Police Dep’t (Sussex), GRC Complaint No. 2013-90 (October 2013); Gartner v. Borough of Middlesex (Middlesex), GRC Complaint No. 2014-203 (Interim Order dated February 24, 2015).

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 26<sup>th</sup> Day of August 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: August 28, 2025**

**STATE OF NEW JERSEY  
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director  
August 26, 2025 Council Meeting**

**Anne Vukicevich<sup>1</sup>  
Complainant**

**GRC Complaint No. 2022-251**

**v.**

**Moorestown Township (Burlington)<sup>2</sup>  
Custodial Agency**

**Records Relevant to Complaint:**

March 4, 2022 OPRA Request: Copies of “[r]eports/documentation from 7/22/21 inspections by three township code/sub-code enforcers of [a specific address] including repairs required subsequent to those inspections. Reports/documentation from 10/4/21 township final inspection of those repairs and township 7/16/21 final inspection of permit for leaking oil tank removal.”

March 25, 2022 OPRA Request: Copies of the following relating to the specific address:

1. “All U.C.C F 260 (certificates of occupancy, approval, temporary occupancy); all F140, 100, 170, 130, 120 along with any documentation submitted by property owners/contractors during permit application process from the year 2000 to the present;
2. [P]ermit/approval UCC forms for permit 01-0431 and 14-0803 along with any and all other forms specifically requested.
3. Copies of the two most recent certificates of smoke and carbon monoxide detector compliance for the property.
4. Copies of any and all correspondence from township employers to property owners, other township department/employees, the department of health, DOH employees, Ellis HVAC.
5. All documentation from and/or pertaining township inspection on 7/22/21 and final plumbing inspection on 10/4/21.
6. Any notice sent to property owners from the township[.]”

**Custodian of Record:** Patricia L. Hunt

**Request Received by Custodian:** March 4, 2022; March 25, 2022

**Response Made by Custodian:** March 15, 2022; March 28, 2022; June 8, 2022

**GRC Complaint Received:** June 6, 2022

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

<sup>2</sup> Represented by Douglas L. Heinold, Esq. of Raymond Coleman Heinold LLP (Moorestown, NJ).

## **Background<sup>3</sup>**

### **Request and Response:**

On March 4, 2022, the Complainant submitted her first (1<sup>st</sup>) Open Public Records Act (“OPRA”) request to the Custodian seeking the above-mentioned records. On March 15, 2022, the Custodian responded in writing and provided the records responsive to the subject request.

On March 21, 2022, the Complainant responded to the Custodian in writing, asking for “specifics as to why all of the documentation [she] requested wasn’t provided” or for the name of someone in the township who can provide same. On March 22, 2022, Technical Assistant Connie Gooding responded advising that all information with regard to the “removal of the oil tank” had been provided. The Complainant responded in writing advising that her March 4, 2022 OPRA request sought records in addition to those related to the removal of the oil tank. The Complainant stated that she was “asking for details as to why [she] wasn’t sent reports/documents from the three township code enforcers who inspected the interior of [her] unit in July, the final inspection reports for the open permits they also inspected while there (in addition to the removal of leaking oil tank) what repairs they ordered/recommended (specifically in the basement, kitchen, back bedroom and bathroom and any issues found concerning smoke detectors), and documentation from the final inspection conducted on 10/4/21.”

On March 24, 2022, the Complainant requested a status update regarding her request and advised that Moorestown Township’s (“Township”) lack of response was impacting a pending litigation. On March 25, 2022, Ms. Gooding responded advising that all information had been provided. The Complainant responded expressing her confusion with the Township’s lack of documentation relating to the subject property inspections. The Complainant advised she intended to submit a more detailed OPRA request.

On March 25, 2022, the Complainant submitted a second (2<sup>nd</sup>) OPRA request seeking the above-mentioned records. On March 28, 2022, Deputy Clerk Vicki Gough responded in writing on behalf of the Custodian, via GovPilot, a third-party software system, providing responsive records.

### **Denial of Access Complaint:**

On June 6, 2022, the Complainant filed a Denial of Access Complaint with the Government Records Council (“GRC”). The Complainant stated that the genesis of the instant OPRA requests related to several on-site inspections conducted at the home she rents between July and October 2021. The Complainant asserted that, based on her belief, those inspections centered on an oil tank, plumbing, and dwelling safety features.

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<sup>3</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.

The Complainant asserted that she filed an OPRA request on March 4, 2022, to which the Custodian responded in writing disclosing records on March 15, 2022. The Complainant stated that upon review, she realized the Custodian's response was incomplete. The Complainant stated that in communications with the Township of the incompleteness of their response, Ms. Gooding advised that she disclosed all records in existence related to the oil tank permit. The Complainant stated that she expressed her confusion with the Township's failure to disclose additional records and noted she would be filing a new OPRA request after receiving a second response from Ms. Gooding that no additional records existed.

The Complainant stated that she submitted a more specific OPRA request on March 25, 2022. The Complainant stated that she received confirmation of her submission and that no further communications were received. The Complainant contended that her complaint focused on the following:

- (1) "Reports/documentation from 3 inspections on 7/22/21[;]
- (2) Documentation of reports required subsequent to those inspections[;]
- (3) Report/documentation from 10/4/21 final inspection[;] and
- (4) Report/documentation from 7/16/21 inspection[.]"

The Complainant contended that responsive records must exist because the Township should have a "paper trail" of their inspections from initiation to conclusion. The Complainant stated that as a tenant renting from a landlord not monitored by the Department of Community Affairs ("DCA"), she should be able use OPRA "to easily access certificates of approval and occupancy, reports of open permits, any township inspections that occur during [her] tenancy and certificates of smoke and carbon monoxide detector compliance."

### Supplemental Response

On June 8, 2022, the Custodian responded in writing confirming receipt of the Denial of Access Complaint. The Custodian stated that the Township was surprised by the Complainant's complaint as they had responded to the subject request on March 28, 2022. The Custodian advised that unbeknownst to the Township, the March 28, 2022 response failed to transmit due the file size limits in GovPilot. The Custodian stated that the complaint prompted the Township to review its responses, wherein it discovered the delivery failure. The Custodian stated that she was attaching the GovPilot record showing the response, as well as the records for which delivery failed on March 28, 2022. The Custodian note that additional disclosures via e-mail would be forthcoming and apologized for the issue.

### Statement of Information:

On June 23, 2022, the Custodian filed a Statement of Information ("SOI"). The Custodian certified that she received the Complainant's OPRA requests on March 3, 2022<sup>4</sup> and March 25, 2022.

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<sup>4</sup> The evidence of record reflects the Complainant's OPRA request was emailed to the Custodian on March 4, 2022.

The Custodian certified, regarding the Complainant's March 4, 2022 OPRA request, her search included forwarding the request to Ms. Gooding, who performed a search for an electronic file relating to a permit for an oil tank removal at the subject property. The Custodian certified that on March 15, 2022 she responded in writing and provided "the permit file for an oil tank removal[.]" The Custodian certified to said disclosure, noting that the request was "vague" and Ms. Gooding understood same to be for records relating to "(only) the oil tank as that what was specifically referenced." The Custodian asserted that there was no unlawful denial of access as all records responsive to the Complainant's March 4, 2022 request had been provided.

The Custodian certified that on March 21, 2022 the Complainant emailed the Township on explaining she did not believe that all requested documents had been provided. The Custodian certified that Ms. Gooding, under the impression that the Complainant's request sought records related only to the removal of the oil tank, responded in writing that all information relating to same had been provided. The Custodian certified that the Complainant seemed frustrated and stated that she intended to file a more specific OPRA request.

The Custodian certified regarding the Complainant's March 25, 2022 OPRA request, her search for responsive records to this request included forwarding same to Ms. Gooding, who performed a search for electronic files relating to the subject property. The Custodian certified that the Township caused a timely response via GovPilot on March 28, 2022. The Custodian stated that GovPilot is a third-party software system, with a 25MB file size limit, that the Township utilizes to assist with OPRA document requests. The Custodian stated that the GovPilot program does not provide notifications if a file fails to transmit.

The Custodian stated that the GovPilot program indicated that the subject request was fulfilled as of March 28, 2022. The Custodian stated, however, that unbeknownst to her office, the responsive records exceeded the file limits and the GovPilot delivery failed. The Custodian stated that the Complainant did not alert the Custodian that the responsive documents had not been received. The Custodian asserted that it was not until the filing of this complaint that she became aware of GovPilot's delivery failure. The Custodian noted that upon notification of the error through this complaint, the Township responded in writing and redisclosed the records via email in three separate parts on June 8, 2022. The Custodian asserted that there was no unlawful denial of access as all records responsive to the Complainant's March 25, 2022 request had been provided. The Custodian further stated that her actions were not deliberate and do not rise to the level of a knowing and willful violation.

## **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).<sup>5</sup> 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 dated October 31, 2007).

### March 25, 2022 OPRA Request

In Anonymous v. Borough of Haledon (Passaic), GRC Complaint No. 2022-222 (October 2023), the complainant argued that the custodian failed to timely respond to a January 19, 2021 OPRA request. In the SOI, the custodian certified that he responded through the GovPilot system on January 26, 2021; however, the delivery failed because the file size was too large. The custodian further certified that GovPilot did not notify staff of the failure, and that he rectified the issue by disclosing the record in smaller parts shortly after being made aware of the issue through the complaint filing. Upon consideration, the Council held that no "deemed" denial of access occurred reasoning that:

[T]he Borough endeavored to respond in a timely manner, yet unbeknownst to the Custodian or staff, said response was rejected. It is not the case here that the Custodian either intended to but did not send his response at all or committed a typographical error of the Complainant's e-mail address. See *e.g.* Owoh, Esq. (O.B.O. AADARI) v. City of Asbury Park (Monmouth), GRC Complaint No. 2018-211 (August 2020). Instead, the Custodian fully responded and was not made aware of any delivery failures until the filing of this complaint many months after the fact. For this reason, the GRC cannot reasonably find that GovPilot's system not sending a delivery failure notification to the Custodian amounts to "deemed" denial of access here.

[Id. at 3.]

Here, the Complainant submitted her second (2<sup>nd</sup>) OPRA request on March 25, 2022 and the Township caused a response to be sent through GovPilot on March 28, 2022. This complaint followed, wherein the Complainant alleged an unlawful denial of access after not receiving a response. In the SOI, the Custodian certified that upon receipt of the complaint, she immediately responded in writing, on June 8, 2022, via three (3) separate emails, redisclosing the responsive records and noting the Township's surprise to the filing of the complaint as they had already responded on March 28, 2022. The Custodian certified that due to the complaint, the Township became aware of a GovPilot error that resulted in the response never being sent; however, the system did not alert her of this delivery failure. Upon review, the GRC finds the facts here similar to Anonymous, GRC 2022-222 and determines that a similar holding is appropriate under the circumstances presented.

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<sup>5</sup> 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.

Therefore, no “deemed” denial of access occurred here because, notwithstanding the unnotified GovPilot delivery failure issue, the Custodian timely responded in writing, applicable to the March 25, 2022 OPRA request, within the statutory timeframe providing all responsive records. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i); Anonymous, GRC 2022-222.

In closing, the GRC notes that agencies utilizing third party online OPRA request systems may consider as a best practice reviewing that system through the applicable reporting functions on a regular basis. Such a practice could ensure that any unnoticed delivery failures are rectified in a timely manner and without the need for litigation.

### **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 Alcoholic Beverage Control, 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);<sup>6</sup> 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).

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<sup>6</sup> Affirmed on appeal regarding Bent v. Stafford Police Dep’t, GRC Case No. 2004-78 (October 2004).



Invalid OPRA requests typically fall 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.

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 March 4, 2022 OPRA request sought “[r]eports/documentation from 7/22/21 inspections by three township code/sub-code enforcers of 210 Mannion Ave (formerly known as 209 Mannion Ave, Block 2109, Lot 5), including repairs required subsequent to those inspections. Reports/documentation from 10/4/21 township final inspection of those repairs and township 7/16/21 final inspection of permit for leaking oil tank removal.” The Custodian responded in writing providing what she thought were all records responsive to the subject request. Thereafter the Complainant responded seeking clarification as to why she did not receive “reports/documents from the three township code enforcers who inspected the interior of [her] unit in July, the final inspection reports for the open permits they also inspected while there

(in addition to the removal of leaking oil tank) what repairs they ordered/recommended (specifically in the basement, kitchen, back bedroom and bathroom and any issues found concerning smoke detectors), and documentation from the final inspection conducted on 10/4/21,” to which Ms. Gooding, on behalf of the Custodian, responded that all responsive records had been provided.

A plain reading of the March 4, 2022 OPRA request supports a finding that said request is invalid because it fails to identify any specific government record under OPRA. In her Denial of Access Complaint, the Complainant expressly states that she should be able to “easily access certificates of approval and occupancy, reports of open permits, any township inspections that occur during [her] tenancy and certificates of smoke and carbon monoxide detector compliance.” Certainly, the Complainant was aware of the types of records that are or should be accessible and could have specifically requested same. However, rather than identify a specific government record, the Complainant instead submitted a blanket request for all “reports/documentation”, leaving it to the Custodian to carefully review a larger universe of records and make a subjective determination as to which records qualify as responsive to the Complainant’s generic request; actions that the Lagerkvist court said the custodian is not required to undertake. Thus, the GRC is satisfied that the March 4, 2022 OPRA request is invalid, as the request is overly broad and fails to identify a specific government record.

Notwithstanding, the GRC is compelled to address the Custodian’s efforts to accommodate the subject OPRA request. Specifically, despite its overly broad nature, the Custodian conducted a search and disclosed what she believed to be all responsive records on March 15, 2022. The Custodian certified to said disclosure in the SOI, noting that the request was “vague” and she believed the request sought records relating to only the oil tank as that was what the Complainant specifically referenced.

A similar issue was addressed by the court in Burke v. Brandes, 429 N.J. Super. 169 (App. Div. 2012), where the court held that the defendant “performed a search and was able to locate records responsive . . .” which “. . . belied any assertion that the request was lacking in specificity or was overbroad.” Id. at 177. See also Gannett v. Cnty. of Middlesex, 379 N.J. Super. 205 (App. Div. 2005) (holding that “[s]uch a voluntary disclosure of most of the documents sought . . . constituted a waiver of whatever right the County may have had to deny Gannett’s entire OPRA request on the ground that it was improper.” Id. at 213).

Generally, in situations where a request was overly broad on its face but the custodian was able to locate records, the Council has followed Burke, in determining that the request contained sufficient information for record identification. See Bond v. Borough of Washington (Warren), GRC Complaint No. 2009-324 (Interim Order dated March 29, 2011); Verry v. Borough of South Bound Brook (Somerset), GRC Complaint No. 2010-302 (Interim Order dated January 31, 2012). However, there have been instances where, notwithstanding the custodian’s ability to locate certain records, the Council has determined that the request was nevertheless invalid. See Ciszewski v. Newton Police Dep’t (Sussex), GRC Complaint No. 2013-90 (October 2013) at 4-5; Gartner v. Borough of Middlesex (Middlesex), GRC Complaint No. 2014-203 (Interim Order dated February 24, 2015).

Similar to Ciszewski and Gartner, the request here required research that the Custodian was not obligated to perform. Thus, although the Custodian undertook the task of locating records, which were disclosed to the Complainant, the invalid nature of the request makes it impossible to ensure that all responsive records falling within the confines of the request were located and disclosed. See also Wolosky v. Twp. of Booton (Morris), GRC Complaint No. 2010-243 (February 2012). Considering the subsequent communications and submission of the Complainant's second OPRA request, it is clear that there was some confusion as to the exact records being sought. Based on this, the GRC is persuaded that the facts of this complaint are more in line with the preceding case law and distinguishable from Burke.

Accordingly, the Complainant's March 4, 2022 is invalid because it fails to identify a specific record and would require the Custodian to perform research and make subjective determinations. 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; Lagerkvist, 443 N.J. Super. at 237; Schuler, GRC 2007-151. Thus, the Custodian lawfully denied this request. N.J.S.A. 47:1A-6. Further, the Custodian's efforts to accommodate the Complainant's request did not cure the validity issue. See Ciszewski, GRC 2013-90; Gartner, GRC 2014-203.

### **Conclusions and Recommendations**

The Executive Director respectfully recommends the Council find that:

1. No "deemed" denial of access occurred here because, notwithstanding the unnotified GovPilot delivery failure issue, the Custodian timely responded in writing, applicable to the March 25, 2022 OPRA request, within the statutory timeframe providing all responsive records. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i); Anonymous v. Borough of Haledon (Passaic), GRC Complaint No. 2022-222 (October 2023).
2. The Complainant's March 4, 2022 is invalid because it fails to identify a specific record and would require the Custodian to perform research and make subjective determinations. MAG Entm't, LLC v. Div. of Alcoholic Beverage Control, 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); 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). Thus, the Custodian lawfully denied this request. N.J.S.A. 47:1A-6. Further, the Custodian's efforts to accommodate the Complainant's request did not cure the validity issue. See Ciszewski v. Newton Police Dep't (Sussex), GRC Complaint No. 2013-90 (October 2013); Gartner v. Borough of Middlesex (Middlesex), GRC Complaint No. 2014-203 (Interim Order dated February 24, 2015).

Prepared By: Jennifer C. Howell  
Staff Attorney

August 19, 2025