



State of New Jersey

DEPARTMENT OF COMMUNITY AFFAIRS
101 SOUTH BROAD STREET
PO Box 819
TRENTON, NJ 08625-0819

MIKIE SHERRILL
Governor

DR. DALE G. CALDWELL
Lieutenant Governor

JACQUELYN A. SUÁREZ
Commissioner

FINAL DECISION

March 31, 2026 Government Records Council Meeting

Debra Salters
Complainant

Complaint No. 2022-632

v.

City of Newark (Essex)
Custodian of Record

At the March 31, 2026, public meeting, the Government Records Council (“Council”) considered the March 24, 2026, 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 March 30, 2022 OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian’s failure to respond in writing to this OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the extended time frame 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). See also Kohn v. Twp. of Livingston Library (Essex), GRC Complaint No. 2007-124 (March 2008).
2. The Custodian did not bear her burden of proof that she timely responded to the Complainant’s April 11, 2022 OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian’s failure to respond in writing to this 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), GRC 2007-11
3. Notwithstanding the “deemed” denial of access, the Custodian has borne her burden of proof that she lawfully denied access to the Complainant’s March 30, 2022 OPRA request. Specifically, the Custodian certified in the Statement of Information, and the record reflects, that no records responsive to the Complainant’s March 30, 2022 OPRA request exist. N.J.S.A. 47:1A-6; See Pusterhofer v. N.J. Dep’t of Educ., GRC Complaint No. 2005-49 (July 2005).

4. Notwithstanding the “deemed” denial of access, the Custodian did not unlawfully deny access to the Complainant’s April 11, 2022 OPRA request. N.J.S.A. 47:1A-6. Specifically, the Custodian certified, and the record reflects, the Custodian disclosed to the Complainant all responsive records in the City of Newark’s possession. Danis v. Garfield Bd. of Educ. (Bergen), GRC Complaint No. 2009-156, et seq. (Interim Order dated April 28, 2010); See also, Burns v. Borough of Collingswood, GRC Complaint No. 2005-68 (September 2005); Holland v. Rowan Univ., GRC Complaint No. 2014-63, et seq. (March 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 31st Day of March 2026

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: April 2, 2026

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
March 31, 2026 Council Meeting**

**Debra Salters¹
Complainant**

GRC Complaint No. 2022-632

v.

**City of Newark (Essex)²
Custodial Agency**

Records Relevant to Complaint:

March 30, 2022 OPRA Request: Copies of video camera footage “outside council chambers in the hallway” from “Tuesday, March 8, 2022; between 10 – 11 am.”

April 11, 2022 OPRA Request: Copies of:

1. “A list of all federal dollars given to the City of Newark [(“City”)] with dates, amounts, and release of funds dates (from 1/2019 – present)
2. A list of all properties provided to Newark residents through the land banking, dealing w/ Invest Newark.
3. A total of all funds allocated to the Water Dept., from 1/2019 – present: including all emergency funding and otherwise.”

Custodian of Record: Kecia Daniels

Request Received by Custodian: March 30, 2022; April 11, 2022

Response Made by Custodian: March 30, 2022; April 20, 2022; May 2, 2022; July 18, 2022; December 8, 2022

GRC Complaint Received: November 7, 2022

Background³

Request and Response:

On March 30, 2022, the Complainant submitted her first (1st) Open Public Records Act (“OPRA”) request to the Custodian seeking the above-mentioned records. On the same day, City

¹ No legal representation listed on record.

² Represented by Samora F. Noguera, Esq. (Newark, 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.

Debra Salters v. City of Newark (Essex), 2022-632 – Findings and Recommendations of the Executive Director

Clerk Kenneth Louis responded in writing acknowledging receipt of the OPRA request and the response time frame through April 21, 2022.

On April 11, 2022, the Complainant submitted her second (2nd) OPRA request to the Custodian seeking the above-mentioned records.

On April 20, 2022, the seventh (7th) business day after receipt of the April 11, 2022 OPRA request, OPRA Unit employee Delois Johnson responded verbally via telephone on behalf of the Custodian advising the Complainant that records responsive to the April 11, 2022 OPRA request item No. 3 were available for in person pick up. On April 26, 2022, the Complainant purportedly appeared in person and retrieved said records.

On May 2, 2022, the fourteenth (14th) business day after receipt of the April 11, 2022 OPRA request, Custodian's Counsel responded in writing on behalf of the Custodian providing records responsive to the Complainant's April 11, 2022 OPRA request item No. 1 received from the Finance Department.

On May 9, 2022, OPRA Unit employee Ilsa Cintron e-mailed Department of Administration employee Thomas White seeking a status update on the "overdue" March 30, 2022 OPRA request. Ms. Cintron noted that the Clerk's Office did not receive either the requested record or any other responses. On June 1, 2022, Mr. White forwarded Ms. Cintron's e-mail to several other departments noting that a failure to timely respond could result in legal action. On July 14, 2022, Department of Public Works ("DPW") Director Craig Smith sent a memorandum to the Clerk's Office advising that no recordings responsive to the March 30, 2022 OPRA request exist.

On July 15, 2022, the fifty-sixth (56th) business day beyond the extended response timeframe, Ms. Cintron responded in writing advising that there were no records responsive to the Complainant's March 30, 2022 OPRA request.

Denial of Access Complaint:

On November 7, 2022, the Complainant filed a Denial of Access Complaint with the Government Records Council ("GRC"). The Complainant asserted that she filed the first (1st) OPRA request on March 30, 2022. The Complainant stated that Ms. Cintron responded in writing on July 18, 2022, "stating that they do not have the footage."

The Complainant stated that she submitted a second (2nd) OPRA request on April 11, 2022, seeking the above-mentioned records. The Complainant stated she did not receive a response.

Supplemental Responses:

On November 23, 2022, the Division of Economic and Housing Development's response sent a memorandum to Ms. Cintron attaching records responsive to the April 11, 2022 OPRA request item No. 2. On November 28, 2022 and December 6, 2022, Ms. Cintron purportedly called the Complainant advising that records responsive to her April 11, 2022 OPRA Request Item No. 2 were available for in-person pick up.

On December 8, 2022, the one hundred sixty-fifth (165th) business day after receipt of the April 11, 2022 OPRA request, the Custodian responded in writing disclosing records responsive to all three (3) OPRA request items over twelve (12) e-mails. On the same day, Custodian's Counsel also resent the Complainant the response to the March 30, 2022 OPRA request advising that no records existed.

Statement of Information:

On December 21, 2022, the Custodian filed a Statement of Information ("SOI"). Regarding the March 30, 2022 OPRA request, the Custodian certified that she received a forwarded copy of same from the DPW on said date. The Custodian certified that, on May 9, 2022 and June 1, 2022, the City's OPRA Unit contacted various representatives seeking a response. The Custodian certified that Director Smith caused a search for responsive records to be completed at a time prior to July 14, 2022, which returned no results. The Custodian certified that, on July 15, 2022, Ms. Citron forwarded DPW's memorandum to the Complainant, which stated that there was "no video footage" responsive to the OPRA request.

The Custodian stated that, upon receipt of the Denial of Access Complaint, the City conducted another search for responsive records and learned that "footage . . . purges after thirty (30) days pursuant to the State's Retention Schedule," and that therefore the likely purge date for any recordings responsive to the OPRA request was April 9, 2022. The Custodian argued that this portion of the complaint was moot per Stop & Shop Supermarket Co., LLC v. Cnty. of Bergen, 450 N.J. Super. 286 (App. Div. 2017), because the Custodian responded through Ms. Cintron prior to the filing of this complaint.

Regarding the April 11, 2022 OPRA request, the Custodian certified that she received it on the same date and forwarded a copy of same to the Finance Department, the Department of Water and Sewer Utilities, and the Department of Economic and Housing Development. Regarding OPRA request item No. 3, the Custodian stated that Ms. Johnson "sent the Complainant the response of the Water Department on April 20, 2022." Regarding OPRA request item No. 1, the Custodian stated that "the OPRA Unit provided Complainant with the Finance Department's initial response on April 26, 2022" and that Custodian's Counsel also e-mailed the Complainant a copy of same on May 2, 2022. Regarding OPRA request item No. 2, the Custodian further certified that Ms. Cintron received records from the Division of Economic and Housing Development on November 23, 2022, and purportedly sent them Complainant.

The Custodian certified that upon receipt of the Denial of Access Complaint the City searched for additional records responsive to the OPRA request. The Custodian stated that Custodian's Counsel sent the Complainant "amended responses from the Finance Department as well as those previously provided responses from the Water and Public Work Departments and the Economic and Housing Development Division." The Custodian further certified that, on December 8, 2022, Custodian's Counsel provided the Complainant with "the responses of the Department of Public Works, the Water Department, and the researched Finance Response, and the EHD response over thirteen (13) emails." The Custodian certified that "the Complainant received all responsive documents on December 8, 2022."

Supplemental Response:

On February 1, 2023, Ms. Cintron purportedly called the Complainant advising that the records responsive to her April 11, 2022 OPRA Request Item No. 2 were available for pick up. On February 7, 2023, the Complainant purportedly appeared in person and retrieved said records.

Additional Submissions

On August 21, 2025, the GRC sent a request for additional information to the Custodian. Therein, the GRC requested that the Custodian provide additional documentation evidencing the correspondence of the following responses to the Complainant's April 11, 2022 OPRA request: the April 20, 2022 response from the Water Department; the Finance Department's April 26, 2022 and May 2, 2022 responses; and Ms. Cintron's November 23, 2022 response.

On August 25, 2025, Custodian's Counsel responded to the GRC's request for additional information, attaching certifications from himself, Ms. Johnson, and Ms. Cintron. Regarding OPRA Request Item No. 3, Ms. Johnson certified that she called the Complainant on April 20, 2022, and advised that the records responsive to her request were available for pick up, as per her request. See Johnson Cert. §6 and §8. Ms. Johnson further certified that the Complainant appeared in person at the OPRA Unit offices on April 26, 2022, and collected the Water Department's records responsive to her April 11, 2022 OPRA request. Id. §9. Regarding OPRA Request Item No. 1, Custodian's Counsel certified that he provided the Finance Department's initial response to the Complainant via email on May 2, 2022. See Noguera Cert. §4 and §5. Regarding OPRA Request Item No. 2, Ms. Cintron certified that she informed Complainant by phone that the records responsive to her request were "ready for pick up" as per her request on November 28, 2022, December 6, 2022, and February 1, 2023. See Cintron Cert. §5, §7, §8 and §9. Ms. Cintron further certified that the Complainant "physically collected" the Department of Economic and Housing Development's records responsive to her April 11, 2022 OPRA request in-person on February 7, 2023. Id. §10.

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).⁴ 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).

⁴ 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.

Debra Salters v. City of Newark (Essex), 2022-632 – Findings and Recommendations of the Executive Director

The GRC has also addressed the issue of requests for additional time to respond to OPRA requests. In Kohn v. Twp. of Livingston Library (Essex), GRC Complaint No. 2007-124 (March 2008), the custodian responded in writing on the fifth (5th) business day after receipt of the complainant’s March 19, 2007 OPRA request seeking an extension of time until April 20, 2007. Then on April 20, 2007, the custodian responded stating that the requested records would be provided later in the week. Id. The evidence of record shows that no records were provided until May 31, 2007. Id. The GRC held that:

The Custodian properly requested an extension of time to provide the requested records to the Complainant by requesting such extension in writing within the statutorily mandated seven (7) business days pursuant to N.J.S.A. 47:1A-5(g) and N.J.S.A. 47:1A-5(i) . . . however . . . [b]ecause the Custodian failed to provide the Complainant access to the requested records by the extension date anticipated by the Custodian, the Custodian violated N.J.S.A. 47:1A-5(i) resulting in a “deemed” denial of access to the records.

[Id.]

March 30, 2022 OPRA request

In the instant matter, the Complainant submitted her first (1st) OPRA request on March 30, 2022. Mr. Louis acknowledged receipt on the same day and extended the response time frame through April 21, 2022. Thereafter, the City did not respond again until July 18, 2022, the fifty-ninth (59th) business day beyond the extended response timeframe, when Ms. Cintron advised that there were no records responsive to the request. The Custodian certified to the foregoing in the SOI. Thus, the evidence of record indicates that the Custodian failed to respond to Complainant’s March 30, 2022 OPRA request within the statutorily mandated seven (7) business day timeframe, as extended, resulting in a “deemed” denial of access.

Therefore, the Custodian did not bear her burden of proof that she timely responded to the Complainant’s March 30, 2022 OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian’s failure to respond in writing to this OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the extended time frame 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. See also Kohn, GRC 2007-124.

April 11, 2022 OPRA request

The Complainant submitted her second (2nd) OPRA request on April 11, 2022. Regarding OPRA request item No. 3, Ms. Johnson allegedly responded verbally on April 20, 2022, the seventh (7th) business day after receipt of the OPRA request advising the Complainant that responsive records were ready for pickup. Regarding OPRA request item No. 1, Custodian’s Counsel responded in writing on May 2, 2022, the fifteenth (15th) business day after receipt. Regarding OPRA request item No. 2, Ms. Cintron allegedly responded verbally on November 28, 2022, the one hundred fifty-seventh (157th) business day after receipt, advising the Complainant that responsive records were available for pickup. The Custodian certified to the foregoing in the

SOI and with additional certifications submitted by Custodian's Counsel, Ms. Johnson, and Ms. Cintron.

Initially, the evidence of record shows that neither the Custodian nor any other City employees contacted the Complainant in writing within seven (7) business days as required under OPRA. Instead, the Complainant was given mostly verbal responses, as indicated in the legal certifications submitted by both Ms. Johnson and Ms. Cintron. The GRC notes that verbal responses are improper under OPRA. N.J.S.A. 47:1A-5(g); N.J.S.A. 47:1A-5(i); see Morris v. Borough of Victory Gardens (Morris), GRC Complaint No. 2008-137 (Interim Order dated February 23, 2010). Written responses were not sent to the Complainant until May 2, 2022 and December 8, 2022. Both dates fall well beyond the expiration of OPRA's statutory time frame. Thus, the evidence of record indicates that the Custodian through various City employees failed to respond to Complainant's April 11, 2022 OPRA request within the statutorily mandated seven (7) business day timeframe, resulting in a "deemed" denial of access.

Therefore, the Custodian did not bear her burden of proof that she timely responded to the Complainant's April 11, 2022 OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian's failure to respond in writing to this 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.

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.

March 30, 2022 OPRA request

The Council previously found that, where a custodian certified that no responsive records exist, no unlawful denial of access occurred. See Pusterhofer v. NJ Dep't of Educ., GRC Complaint No. 2005-49 (July 2005). Specifically, in Pusterhofer, the custodian certified that no records responsive to the complainant's request for billing records existed and the complainant submitted no evidence to refute the custodian's certification regarding said records. The Council determined that because the custodian certified that no records responsive to the request existed and no evidence existed in the record to refute the custodian's certification, there was no unlawful denial of access to the requested records.

Here, the Complainant's March 30, 2022 OPRA request sought video camera footage "outside council chambers in the hallway" from "Tuesday, March 8, 2022; between 10 – 11 am." In the Denial of Access Complaint, the Complainant stated that she received an email from Ms. Cintron on July 18, 2022, "stating that they do not have the footage." In the SOI, the Custodian certified that, on July 15, 2022, Ms. Cintron advised the Complainant in writing that there were no responsive records to this request. The Custodian included documentation supporting that Ms.

Cintron sent her e-mail on July 15, 2022. The Custodian also certified that based on the State's retention schedule the last day the requested recording may have existed was April 9, 2022.⁵

Accordingly, notwithstanding the "deemed" denial of access, the Custodian has borne her burden of proof that she lawfully denied access to the Complainant's March 30, 2022 OPRA request. Specifically, the Custodian certified in the SOI, and the record reflects, that no records responsive to the Complainant's OPRA request exist. N.J.S.A. 47:1A-6; See Pusterhofer, GRC 2005-49.

April 11, 2022 OPRA request

In Danis v. Garfield Bd. of Educ. (Bergen), GRC Complaint No. 2009-156, et seq. (Interim Order dated April 28, 2010), the Council found that the custodian did not unlawfully deny access to the requested records based on the custodian's certification that all such records were provided to the complainant. The Council held that the custodian's certification, in addition to the lack of refuting evidence from the complainant, was sufficient to meet the custodian's burden of proof. See also Burns v. Borough of Collingswood, GRC Complaint No. 2005-68 (September 2005); Holland v. Rowan Univ., GRC Complaint No. 2014-63, et seq. (March 2015).

Here, the Complainant's April 11, 2022 OPRA request contained three (3) request items seeking various lists and information. The Complainant asserted in the Denial of Access Complaint that she did not receive a response to her OPRA request. In the SOI the Custodian certified to various dates that the Complainant was either provided with responsive records or was contacted by OPRA Unit employees to retrieve hard copies of records from the City. The Custodian further certified that upon receipt of the Denial of Access Complaint, the City searched for additional records responsive to the subject request. The Custodian certified that Custodian's Counsel ultimately disclosed all records responsive to the OPRA request via multiple e-mails on December 8, 2022

Upon review of the facts and evidence submitted here, the GRC ultimately concludes that notwithstanding the "deemed" denial, all records were ultimately provided to the Complainant as of December 8, 2022. However, it should be noted that the City strayed from an efficient system for handing this OPRA request. Instead of choosing to communicate with the Complainant in writing on a regular basis, OPRA Unit employees chose to verbally respond to the Complainant. However, best practices dictate that the City should have sent written responses memorializing the availability of those records and confirmations as to when they were retrieved by the Complainant. Nevertheless, the evidence of record demonstrates that the Custodian provided all responsive records to the Complainant through Counsel as of December 8, 2022. Danis, GRC 2009-156, et seq.; Burns, GRC 2005-68; Holland, GRC 2014-63.

Accordingly, notwithstanding the "deemed" denial of access the Custodian did not unlawfully deny access to the Complainant's April 11, 2022 OPRA request. N.J.S.A. 47:1A-6. Specifically, the Custodian certified, and the record reflects, the Custodian disclosed to the

⁵ The GRC expresses concern that the requested record may have existed at the time that the Complainant submitted her March 30, 2022 OPRA request. However, precedential case law at that time shows that security camera footage was exempt from disclosure under OPRA. Gilleran v. Bloomfield, 227 N.J. 159 (2016); Howard v. N.J. Transit, GRC Complaint No. 2018-43 (November 2019).

Complainant all responsive records in the City of Newark's possession. Danis, GRC 2009-156; Burns, GRC 2005-68; Holland, GRC 2014-63.

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 March 30, 2022 OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian's failure to respond in writing to this OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the extended time frame 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). See also Kohn v. Twp. of Livingston Library (Essex), GRC Complaint No. 2007-124 (March 2008).
2. The Custodian did not bear her burden of proof that she timely responded to the Complainant's April 11, 2022 OPRA request. N.J.S.A. 47:1A-6. As such, the Custodian's failure to respond in writing to this 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), GRC 2007-11
3. Notwithstanding the "deemed" denial of access, the Custodian has borne her burden of proof that she lawfully denied access to the Complainant's March 30, 2022 OPRA request. Specifically, the Custodian certified in the Statement of Information, and the record reflects, that no records responsive to the Complainant's March 30, 2022 OPRA request exist. N.J.S.A. 47:1A-6; See Pusterhofer v. N.J. Dep't of Educ., GRC Complaint No. 2005-49 (July 2005).
4. Notwithstanding the "deemed" denial of access, the Custodian did not unlawfully deny access to the Complainant's April 11, 2022 OPRA request. N.J.S.A. 47:1A-6. Specifically, the Custodian certified, and the record reflects, the Custodian disclosed to the Complainant all responsive records in the City of Newark's possession. Danis v. Garfield Bd. of Educ. (Bergen), GRC Complaint No. 2009-156, et seq. (Interim Order dated April 28, 2010); See also, Burns v. Borough of Collingswood, GRC Complaint No. 2005-68 (September 2005); Holland v. Rowan Univ., GRC Complaint No. 2014-63, et seq. (March 2015).

Prepared By: Frank F. Caruso
Executive Director

March 24, 2026