



**NEW JERSEY GOVERNMENT RECORDS COUNCIL**  
**Administrative Order – *In Camera* Review**

**Victoria Salvador**  
**Complainant**

**GRC Complaint No. 2022-637**

**v.**

**City of Union City (Hudson)**  
**Custodial Agency**

**Custodian of Record:** Hilda I. Rosario  
**Request Received by Custodian:** November 2, 2022  
**GRC Complaint Received:** November 17, 2022

**Order:** The GRC must conduct an *in camera* review of the responsive audio recording to determine the validity of the Custodian's assertion that the record did not qualify as a "government record" for purposes of OPRA. N.J.S.A. 47:1A-1.1; Carter v. Franklin Fire Dist. No. 1 (Somerset), GRC Complaint No. 2011-318 (September 2016). See Paff v. N.J. Dep't of Labor, Bd. of Review, 379 N.J. Super. 346, 355 (App. Div. 2005). **Thus, the Custodian shall deliver<sup>1</sup> to the Council in a sealed envelope nine (9) copies of the requested unredacted records and a document or redaction index.<sup>2</sup>**

**This is an Administrative Order requiring compliance within ten (10) business days after receipt thereof. The Custodian shall also simultaneously deliver<sup>3</sup> certified confirmation of compliance with this Order, in accordance with N.J. Court Rules, R. 1:4-4,<sup>4</sup> to the Executive Director that the record provided is the record requested by the Council for the *in camera* inspection.**

**Effective Date of Disposition:** June 24, 2025

Prepared By: Frank F. Caruso  
Executive Director

Date: June 17, 2025

**Distribution Date: June 26, 2025**

<sup>1</sup> The *in camera* records may be sent overnight mail, regular mail, or be hand-delivered, at the discretion of the Custodian, as long as the GRC physically receives them by the deadline.

<sup>2</sup> The document or redaction index should identify the record and/or each redaction asserted and the lawful basis for the denial.

<sup>3</sup> The certified confirmation of compliance, including supporting documentation, may be sent overnight mail, regular mail, e-mail, facsimile, or be hand-delivered, at the discretion of the Custodian, as long as the GRC physically receives it by the deadline.

<sup>4</sup> "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."