



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

Gregory J. Puliti
Complainant

GRC Complaint No. 2023-107

v.

Township of Lawrence (Mercer)
Custodial Agency

Custodian of Record: Tonya D. Carter
Request Received by Custodian: February 9, 2023
GRC Complaint Received: May 11, 2023

Order: The GRC must conduct an *in camera* review of all responsive Township Council closed session minutes and/or audio recordings to determine the validity of the Custodian's assertion that those records were exempt under the cited exemptions. N.J.S.A. 47:1A-1.1. 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 deliver¹ to the Council in a sealed envelope nine (9) copies of the requested unredacted records, nine (9) copies of the redacted records, and a document or redaction index.²**

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

Effective Date of Disposition: May 28, 2026

Prepared By: Maria M. Rossi
Staff Attorney

Date: May 21, 2026

Distribution Date: June 1, 2026

¹ 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.

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

³ "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."