



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

**Dan Halper**  
**Complainant**

**GRC Complaint No. 2023-141**

v.

**Rutgers University**  
**Custodial Agency**

**Custodian of Record:** Jewell Battle  
**Request Received by Custodian:** January 3, 2023  
**GRC Complaint Received:** June 21, 2023

**Order:** The GRC must conduct an *in camera* review of the 307 pages of redacted e-mails to determine the validity of the Custodian's assertion that the redacted portions thereof were exempt under the cited exemptions. N.J.S.A. 47:1A-1; N.J.S.A. 47:1A-1.1; N.J.S.A. 47:1A-9; 20 U.S.C. § 1232g. 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, nine (9) copies of the redacted 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.<sup>5</sup>**

**Effective Date of Disposition:** January 27, 2026

<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."

<sup>5</sup> Satisfactory compliance requires that the Custodian deliver the record(s) to the Complainant in the requested medium. If a copying or special service charge was incurred by the Complainant, the Custodian must certify that the record has been *made available* to the Complainant but the Custodian may withhold delivery of the record until the financial obligation is satisfied. Any such charge must adhere to the provisions of N.J.S.A. 47:1A-5.



Prepared By: Frank F. Caruso  
Executive Director

Date: January 20, 2026<sup>6</sup>

**Distribution Date: January 29, 2026**

---

<sup>6</sup> This complaint was prepared for adjudication at the Council's February 18, 2025 meeting, but could not be adjudicated due to lack of quorum.