



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Complaint Disposition – No Denial of Access at Issue

Brian Hampel
Complainant

GRC Complaint No. 2024-3

v.

Saddle River Board of Education (Bergen)
Custodial Agency

Custodian of Record: Kaitlyn Lawler
Request Received by Custodian: October 9, 2023
GRC Complaint Received: January 2, 2024

Complaint Disposition: The Complainant states in the Denial of Access Complaint that his sole argument in said complaint is that the agency should be reprimanded for misapplying OPRA to a series of questions he had for the agency. The Complainant did not dispute any denial of access to the requested records pursuant to his alleged October 9, 2023 e-mail request¹. See e.g. Kremer v. Twp. of Stafford (Ocean), GRC Complaint No. 2011-08.

Applicable OPRA Provision: OPRA provides that: “A person who is denied access to a government record by the custodian of the record, at the option of the requestor, may institute a proceeding to challenge the custodian's decision by. . . [filing] a complaint with the Government Records Council established pursuant to [OPRA].” N.J.S.A. 47:1A-6.

“The Government Records Council shall . . . receive, hear, review and adjudicate a complaint filed by any person *concerning a denial of access to a government record by a record custodian . . .*” N.J.S.A. 47:1A-7(b) (emphasis added).

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.

Effective Date of Disposition: February 24, 2026

Prepared By: Brenda B. Alves
Staff Attorney

Date: February 17, 2026
Distribution Date: February 26, 2026

¹ The GRC notes that an agency should not convert a non-OPRA request in same by addressing it under OPRA; however, doing so does not represent a *per se* violation of OPRA. Here, the Custodian treated the Complainant’s letter asking questions and seeking certain records related to those questions as an OPRA request. However, the Complainant did not invoke OPRA anywhere in his letter.