



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Complaint Disposition – Not a Valid OPRA Request

Kevin Patrick Moran
Complainant

GRC Complaint No. 2024-276

v.

West Deptford Township Police Department (Gloucester)
Custodial Agency

Custodian of Record: Jill S. Magill

Request Received by Custodian: November 15, 2024

GRC Complaint Received: December 20, 2024

Complaint Disposition: The Complainant submitted an electronic written request with the subject line “[c]opy of incident report request” that did not reference OPRA.¹ Since the Complainant did not provide his address in his request, the Custodian advised that if he resided within the Custodian’s jurisdiction, she would respond to the request “as a Common Law right of access request.” OPRA is invoked only when a requestor submits a valid OPRA request for “government records.” Thus, the request as written is invalid under OPRA, and this complaint is dismissed.²

Applicable OPRA Provision: “A person who is denied access to a government record by the custodian of the record, at the option of the requestor, may . . . in lieu of filing an action in Superior Court, file 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 records custodian . . .” N.J.S.A. 47:1A-7(b).

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.

¹ The Complainant filed an OPRA request with the Borough of National Park (“Borough”) on November 18, 2024, which the Borough responded to on November 26, 2024. However, the Complainant filed this Denial of Access Complaint against West Deptford Township. Because this complaint was not filed against the Borough, the GRC cannot consider any claim against that agency.

² OPRA provides that “. . . a letter, or an email from a requestor including all the information required on the adopted form shall suffice in place of a completed form as a valid government record request. If the letter or email from a requestor includes substantially more information than required on the adopted form and requires more than reasonable effort to clarify the information, the custodian may deny the request.” N.J.S.A. 47:1A-5(f). Therefore, requestors may submit a request not on an adopted OPRA request form but must include all required form information set forth in OPRA.



Effective Date of Disposition: February 18, 2025

Prepared By: Jennifer C. Howell
Staff Attorney

Date: February 11, 2025

Distribution Date: February 20, 2025