



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

Giancarlo R. D’Orazio
Complainant

GRC Complaint No. 2024-44

v.

Township of Washington (Gloucester)
Custodial Agency

Custodian of Record: Christine Ciallella
Request Received by Custodian: January 31, 2024
GRC Complaint Received: February 14, 2024

Order: The GRC must conduct an *in camera* review of the withheld correspondence to determine the validity of the Custodian’s assertion that the correspondence contained attorney-client privileged information. N.J.S.A. 47:1A-1.1. **Thus, The Custodian shall deliver¹ to the Council in a sealed envelope nine (9) copies of the requested unredacted 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 deliver³ certified confirmation of compliance with this Order, in accordance with N.J. Court Rules, R. 1:4-4,⁴ 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: Samuel A. Rosado
Senior Staff Attorney

Date: June 17, 2025

Distribution Date: June 26, 2025

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 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.

⁴ “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.”