



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Complaint Disposition – Unripe Cause of Action

Bernard J. Meenan, Jr.
Complainant

GRC Complaint No. 2024-49

v.

Township of Edgewater Park (Burlington)
Custodial Agency

Custodian of Record: Patricia Clayton
Request Received by Custodian: February 6, 2024
GRC Complaint Received: February 16, 2024

Complaint Disposition: The Complainant submitted his OPRA request for logs, schedules, duty rosters, and incident reports related to Sergeant David Meenan to the Custodian on February 6, 2024. The Custodian responded in writing on February 14, 2024,¹ extending the response timeframe until April 2, 2024.² The Complainant verified his complaint on February 16, 2024, which was within the extended time period.

Here, this Complaint is materially defective and shall be dismissed because the requested records are not immediate access records and because the Complainant verified his Complaint before the statutory time period for the Custodian to respond, *as extended*, had expired. See Rivera v. Borough of Rutherford Police Dep't. (Bergen), GRC Complaint No. 2011-277 (August 2012); see also, Inzelbuch v. Lakewood Bd. of Educ. (Ocean), GRC Complaint No. 2012-323 (February 2013).

Applicable OPRA Provision: “. . . [A] custodian of a government record shall grant access to a government record or deny access to a government record as soon as possible, but not later than seven business days after receiving the request . . .” N.J.S.A. 47:1A-5(i).

“A person who is denied access to a government record by the custodian of the record . . . may institute a proceeding to challenge the custodian’s decision by filing . . . a complaint with the Government Records Council . . .” N.J.S.A. 47:1A-6.

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 alleged that he did not receive a response to the OPRA request. However, the Custodian certified that she responded in writing via e-mail on February 14, 2024 and provided supporting documentation.

² The Custodian certified in the Statement of Information that she disclosed the responsive records on April 2, 2024, or the last day of the extended time frame.



Effective Date of Disposition: August 26, 2025

Prepared By: Frank F. Caruso
Executive Director

Date: August 19, 2025

Distribution Date: August 28, 2025