



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

**Jeannie Santiago**  
**Complainant**

**GRC Complaint No. 2025-12**

v.

**City of Jersey City,**  
**Division of City Planning (Hudson)**  
**Custodial Agency**

**Custodian of Record:** Cameron Black  
**Request Received by Custodian:** N/A  
**GRC Complaint Received:** January 21, 2025

**Complaint Disposition:** The Complainant submitted a written request that briefly referenced OPRA<sup>1</sup> on December 27, 2024.<sup>2</sup> The Complainant filed the instant complaint after not receiving a response from the Custodian. OPRA is invoked only when a requestor submits a valid OPRA request for “government records.” Thus, the request as written is invalid under OPRA,<sup>3</sup> and this complaint shall be dismissed.

**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).

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<sup>1</sup> The Complainant’s letter alleged the Planning Board had an obligation under OPRA to share the contents of an envelope exchanged at a public meeting and to note them for the “public record.” It should be noted that the Open Public Meetings Act (“OPMA”) rather than OPRA governs public meetings and the actions of a body subject thereto, and that the GRC has no authority to consider OPMA issues. N.J.S.A. 47:1A-7; Kohn v. Twp. of Livingston (Essex), GRC Complaint No. 2008- 111 (June 2009).

<sup>2</sup> The Complainant also identified “requests” submitted on July 30, 2024, and November 12, 2024. Both letters alleged multiple violations of laws, including OPMA, and sought a packet of documents without mentioning OPRA. Even if those requests were considered valid under OPRA, consideration thereof is time-barred by OPRA’s 45 calendar statute of limitations and will not be addressed. N.J.S.A. 47:1A-6.

<sup>3</sup> OPRA provides that “a letter, or an email from a requestor including all of 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.



**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:** January 27, 2026

Prepared By: Frank F. Caruso  
Executive Director

Date: January 20, 2026<sup>4</sup>

**Distribution Date: January 29, 2026**

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<sup>4</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.