

NEW JERSEY GOVERNMENT RECORDS COUNCIL

Administrative Complaint Disposition – Anonymous Complaints Not Permitted

Frank James Complainant GRC Complaint Nos. 2025-151, 2025-152, 2025-153, 2025-154, 2025-155, 2025-156, and 2025-157¹

v.

Borough of Roselle (Union) Custodial Agency

Custodian of Record: Lisette Sanchez

Request Received by Custodian: June 2, 2025 GRC Complaint Received: June 26, 2025

Complaint Disposition: The Complainant submitted six (6) OPRA requests between May 28, 2023 and May 31, 2025 using the name "Frank James," an address for Woodbridge's Municipal Court, and a telephone number belonging to another complainant.² This consolidated complaint followed; however, based upon the evidence of record, the subject OPRA requests were filed by a requestor using a pseudonym.³ Accordingly, the consolidated complaint is impermissible based on OPRA's clear statutory language prohibiting anonymous requestors,⁴ inclusive of those using a pseudonym, from filing a Denial of Access Complaint. Thus, this consolidated complaint shall be dismissed.

Applicable OPRA Provision: "A request may be submitted anonymously provided, however, that anonymous requestors shall not be permitted to institute proceedings pursuant to [N.J.S.A. 47:1A-7]." N.J.S.A. 47:1A-5(f).

"A person who is denied access to a government record by the custodian of the record, at the option of the requestor who is accurately identified by name, may, within 45 days of the date of denial . . file a complaint with the Government Records Council established pursuant to [N.J.S.A. 47:1A-7]." 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 These complaints have been consolidated due to commonality of parties and issues.

² The GRC recently identified the use of this telephone number connected to an individual named Everett F. Falt, who has filed multiple complaints since June 2025. <u>See https://www.etothedoublet.com/connect.html</u> (accessed August 14, 2025).

³ Merriam Webster defines "pseudonym" as "a fictious name." <u>See</u> "Pseudonym." <u>Merriam -Webster</u>, <u>https://www.merriam-webster.com/dictionary/pseudonym</u> (accessed on August 14, 2025)

⁴ The GRC stresses that while anonymous requestors are prohibited from filing complaints, OPRA still allows requestors to submit OPRA requests anonymously. <u>N.J.S.A.</u> 47:1A-5(f). Custodians receiving anonymous requests should address them the same as OPRA requests where the requestor is not anonymous.



Effective Date of Disposition: August 26, 2025

Prepared By: Frank F. Caruso Executive Director

Date: August 19, 2025

Distribution Date: August 28, 2025