



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Complaint Disposition – Anonymous Complaints Not Permitted

Frank James
Complainant

GRC Complaint Nos. 2025-174
and 2025-183¹

v.

Borough of Carteret (Middlesex)
Custodial Agency

Custodian of Record: Carmela Pogorzelski

Request Received by Custodian: June 24, 2025; June 27, 2025

GRC Complaint Received: July 10, 2025; July 14, 2025

Complaint Disposition: The Complainant submitted two (2) OPRA requests between June 24, 2025 and June 27, 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. See <https://www.etothedoublet.com/connect.html> (accessed August 14, 2025).

³ Merriam Webster defines “pseudonym” as “a fictitious name.” See “Pseudonym.” Merriam - Webster, <https://www.merriam-webster.com/dictionary/pseudonym> (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. N.J.S.A. 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: October 6, 2025

Prepared By: Frank F. Caruso
Executive Director

Date: August 19, 2025

Distribution Date: October 7, 2025