



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Complaint Disposition – Motion to File Within Time Denied

Chris Krol
Complainant

GRC Complaint No. 2025-194

v.

Rutgers University
Custodial Agency

Custodian of Record: Mary Ann Keys

Request Received by Custodian: March 25, 2025; March 26, 2025

GRC Complaint Received: July 24, 2025

Complaint Disposition: The Complainant verified the instant complaint on July 22, 2025, alleging he was denied access to his OPRA requests on April 3, 2025, or 110 days prior. The Complainant argued that his complaint should be accepted because the statute of limitations was unreasonable where the Custodian “repeatedly delayed a reply for weeks later,” rendering the denial was a violation of OPRA, and because the denial was based on OPRA request validity.

Upon review, the GRC is persuaded that this complaint should not be accepted as filed within time. The Complainant’s arguments are contrary to his attempts to file this complaint as early as April 19, 2025.¹ Further, the Complainant was notified of the criteria for filing a complete complaint and the forty-five (45) calendar day statute of limitations on April 21, 2025. Notwithstanding this notification, the Complainant failed to file a complete complaint until July 22, 2025, well beyond the expiration of the statute of limitations. Thus, the Complainant failed to show good cause to permit the complaint to proceed out of time. Therefore, 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 who is accurately identified by name, may, within 45 days of the date of denial . . . file 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 originally submitted his complaint on April 19, 2025, but it was twice returned as incomplete on April 21, 2025. At that time, the Complainant was advised of the applicable statute of limitations. The Complainant later attempted to refile his complaint on June 27, 2025, and, on July 1, 2025, the GRC again returned the complaint advising that not only was it still incomplete, but that the statute of limitations had long since expired. The Complainant properly filed a completed complaint on July 22, 2025, including a motion to file within time.



Effective Date of Disposition: January 27, 2026

Prepared By: Frank F. Caruso
Executive Director

Date: January 20, 2026²

Distribution Date: January 29, 2026

² This complaint was prepared for adjudication at the Council's December 9, 2025 meeting, but could not be adjudicated due to lack of quorum.