



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

Regina Foran
Complainant

**GRC Complaint Nos. 2025-200, 2025-219,
and 2025-248¹**

v.

Borough of Carteret (Middlesex)
Custodial Agency

Custodian of Record: Carmela Pogorzelski
Request Received by Custodian: July 14, 2025
GRC Complaint Received: July 29, 2025

Complaint Disposition: The Complainant submitted three (3) OPRA requests between July 29, 2025 and August 28, 2025 using the name “Regina Foran,” a specific residential address, and a tutamail.com e-mail address. This consolidated complaint followed; however, based upon the evidence of record, the subject OPRA requests were not filed by Regina Foran. Specifically, Custodian’s Counsel certified in the Statement of Information (“SOI”) that Ms. Foran contacted his office on August 20, 2025 stating she received a Letter of Representation and Certification of Service in connection with the above complaints. Custodian’s Counsel certified that Ms. Foran explained that she had never filed an OPRA request with the Borough of Carteret and further confirmed she did not file the instant consolidated Denial of Access Complaints. Custodian’s Counsel certified that Ms. Foran stated she is not familiar with the contact information provided as the address is incorrectly listed. Additionally, Ms. Foran indicated she does not use e-mail communication and is not familiar with and has never once used the e-mail address provided on the original OPRA request and instant complaints. Accordingly, and because the evidence supports the actual requestor did not use their real name and/or contact information, this consolidated complaint is impermissible based on OPRA’s clear statutory language prohibiting anonymous requestors,² 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.

¹ These complaints have been consolidated due to commonality of parties and issues.

² 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.

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: October 6, 2025

Prepared By: Maria M. Rossi
Staff Attorney

Date: September 29, 2025

Distribution Date: October 7, 2025