



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

Chris Krol
Complainant

GRC Complaint No. 2025-226

v.

City of Camden (Camden)
Custodial Agency

Custodian of Record: Luis Pastoriza
Request Received by Custodian: March 11, 2025
GRC Complaint Received: August 11, 2025

Complaint Disposition: The Complainant verified the instant complaint on August 6, 2025, alleging he was denied access to an OPRA request on July 31, 2025. The Complainant argued in his motion that the several submitted OPRA requests identified in the complaint were “ongoing with the Clerk’s office since Mar 11.” The Custodian objected to the motion, arguing that since his denials on March 24, 2025 and May 22, 2025, or one hundred forty (140) and eighty-one (81) calendar days prior to this complaint filing, the Complainant submitted several new OPRA requests seeking essentially the same records. The Custodian argued that per Mason v. City of Hoboken, 196 N.J. 51, 70 (2008), these requests could not be used to circumvent the statute of limitations.

Upon review, the GRC is persuaded that the Complainant’s attempts to stretch the statute of limitations by refiling OPRA requests over a period of several months is inappropriate based on the Appellate Division’s decision in Dalnoky v. Pinelands Reg’l Sch. Dist., 2023 N.J. Super. Unpub. LEXIS 2241 (App. Div. 2023).¹ 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 In Dalnoky, the court affirmed the trial court’s holding that the submission of several similar OPRA requests following and October 23, 2020 denial reasoning that renewing the forty-five (45) day period by filing identical OPRA requests would frustrate the purpose of the statute of limitations. Id. at 10-11.



Effective Date of Disposition: October 6, 2025

Prepared By: Frank F. Caruso
Executive Director

Date: September 29, 2025

Distribution Date: October 7, 2025