



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Complaint Disposition – Unripe Cause of Action

Kristine Tamondong
Complainant

GRC Complaint No. 2025-336

v.

Northern Burlington County Regional High School
Custodial Agency

Custodian of Record: Jamie Williams
Request Received by Custodian: October 20, 2025
GRC Complaint Received: November 6, 2025

Complaint Disposition: The Complainant submitted the subject OPRA request for five (5) categories of records to the Custodian on October 20, 2025. The Custodian responded to the request in writing on October 27, 2025 informing the Complainant that an extension of time until November 10, 2025 was required. The Complainant verified this complaint on November 3, 2025, which is within the extended time period.¹

Here, this complaint is materially defective and shall be dismissed because the requested records are not immediate access records and because the Complainant verified this complaint before the statutory time period for the Custodian to respond, *as extended*, had expired. See Rivera v. Borough of Rutherford Police Dep't (Bergen), GRC Complaint No. 2011-277 (August 2012). See also Inzelbuch v. Lakewood Bd. of Educ. (Ocean), GRC Complaint No. 2012-323 (February 2013).

Applicable OPRA Provision: “Unless a shorter time period is otherwise provided by statute, regulation, or executive order, a custodian . . . shall grant access to a government record or deny a request for access to a government record as soon as possible, but not later than seven business days after receiving the request, or 14 business days if the request is for a commercial purpose or if the records have to be reviewed by the public agency for the purpose of the agency’s compliance with [Daniel’s Law] . . .” N.J.S.A. 47:1A-5(i)(1). N.J.S.A. 47:1A-5(i)(1). Here, this complaint is materially defective and shall be dismissed because [records] are not “immediate access” records and because the Complainant verified this complaint before the applicable statutory time period provided for the Custodian to respond expired.

¹ Subsequent to filing the instant complaint, the Custodian disclosed all responsive records to the Complainant via flash drive per her request. Following disclosure, the Complainant argued that the Custodian disclosed exempt records in violation of OPRA, however, the GRC’s authority does not extend to issues of “too much access”; rather, the GRC can only adjudicate complaints involving denials of access. N.J.S.A. 47:1A-6; N.J.S.A. 47:1A-7.



“A person who is denied access to a government record by the custodian of the record . . . may institute a proceeding to challenge the custodian’s decision by filing . . . 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.

Effective Date of Disposition: January 27, 2026

Prepared By: Maria M. Rossi
Staff Attorney

Date: January 20, 2026

Distribution Date: January 29, 2026