



NEW JERSEY GOVERNMENT RECORDS COUNCIL
Administrative Order – *In Camera* Review

Wassim Elhouar
Complainant

GRC Complaint No. 2025-64

v.

South Orange & Maplewood School District (Essex)
Custodial Agency

Custodian of Record: Imani Moody
Request Received by Custodian: February 26, 2025
GRC Complaint Received: March 17, 2025

Order: The GRC must conduct an *in camera* review of all responsive e-mail communications that were redacted (with attachments where applicable) as identified in privilege logs A, B, and C to determine the validity of the Custodian's assertion that those records were exempt under the cited exemptions. N.J.S.A. 47:1A-1.1; 20 U.S.C.S. §1232(g)(b)(1). See Paff v. N.J. Dep't of Labor, Bd. of Review, 379 N.J. Super. 346, 355 (App. Div. 2005). **Thus, The Custodian shall deliver¹ to the Council in a sealed envelope nine (9) copies of the requested unredacted records, nine (9) copies of the redacted records, and a document or redaction index.²**

This is an Administrative Order requiring compliance within ten (10) business days after receipt thereof. The Custodian shall also simultaneously deliver³ certified confirmation of compliance with this Order, in accordance with N.J. Court Rules, R. 1:4-4,⁴ to the Executive Director that the records provided are the records requested by the Council for the *in camera* inspection.

Effective Date of Disposition: June 24, 2025

Prepared By: Maria M. Rossi
Staff Attorney

Date: June 17, 2025

Distribution Date: June 26, 2025

¹ The *in camera* records may be sent overnight mail, regular mail, or be hand-delivered, at the discretion of the Custodian, as long as the GRC physically receives them by the deadline.

² The document or redaction index should identify the record and/or each redaction asserted and the lawful basis for the denial.

³ The certified confirmation of compliance, including supporting documentation, may be sent overnight mail, regular mail, e-mail, facsimile, or be hand-delivered, at the discretion of the Custodian, as long as the GRC physically receives it by the deadline.

⁴ "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."