



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

Marc Liebeskind
Complainant

GRC Complaint No. 2022-51

v.

Borough of Highland Park (Middlesex)
Custodial Agency

Custodian of Record: Jennifer Santiago
Request Received by Custodian: February 1, 2022
GRC Complaint Received: March 7, 2022

Order: The GRC must conduct an *in camera* review of the five (5) withheld e-mail chains and fifteen (15) redacted e-mail chains to determine the validity of the Custodian’s assertion that e-mail body was exempt under the cited exemption. N.J.S.A. 47:1A-1.1 See Paff v. N.J. Dep’t of Labor, Bd. of Review, 379 N.J. Super. 346, 355 (App. Div. 2005). The GRC notes that this Order does not require submission of the draft “Request for Proposal” or draft redevelopment minutes attached thereto, which will be addressed as part of the *in camera* review. **Thus, The Custodian shall deliver¹ to the Council in a sealed envelope nine (9) copies of the requested unredacted record, nine (9) copies of the redacted record where applicable, 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.

Effective Date of Disposition: February 27, 2024

Prepared By: Frank F. Caruso
Executive Director

Date: February 20, 2024
Distribution Date: February 29, 2024

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.”