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SUPERIOR COURT OF NEW JERSEY
APPELLATE DIVISION

Ernest Bozzi, Plaintiff-Respondent, vs. Jersey City and Irene McNulty, Defendants-Appellants.	DOCKET NO. A-4205-18-T2 On appeal from: Hudson County Law Div. Sat below: Hon. Francis B. Shultz, JSC

Plaintiff-Respondent's BRIEF IN OPPOSITION TO APPEAL

TABLE of CONTENTS

TABLE of AUTHORITIES

New Jersey Supreme Court

New Jersey Superior Court

New Jersey Courts - Other

Statutes

Executive Orders

GRC Rulings

GRC Publications

STATEMENT OF FACTS and PROCEDURAL HISTORY

Plaintiff-Appellant Ernest Bozzi accepts the facts and procedural history as outlined by the Defendants, with but one notation: Plaintiff did not oppose the restraints being granted in the Appellate Division.

LEGAL ARGUMENT

I. THE NATURE OF THE PRIVACY INTEREST FOR ADDRESSES CONTAINED IN GOVERNMENT RECORDS IS NOT AS ALL-ENCOMPASSING AS THE DEFENDANTS WISH IT TO BE.

Our Supreme Court has already unequivocally and undisputedly dealt with how privacy issues in government records are to be addressed. The trial court here did **exactly** what the Supreme Court instructed be done.

Years ago, the government would respond to an OPRA request with an assertion of "privacy" or "private information" and the corresponding lawsuits turned into intellectual free-for-alls trying to wrestle with what was meant by "privacy" and how to measure or quantify it. Eventually, the Supreme Court issued Burnett v. Bergen,198 N.J. 408 (2009), which adopted and adapted the privacy analysis from Doe v. Poritz, 142 N.J. 1 (1995). *See also*, Da17-21, where the appellate division has previously applied the Doe/Burnett test to dog license records and ordered their release in AC-SPCA v. Absecon, A-3047-07

While the Doe/Burnett test at least set a standard for lower

courts to operate from, its very existence created yet another issue: now that there was Supreme Court guidance in the form a privacy "test", the government went overboard asserting that nearly every record "type" that was not the subject of a published decision had to have a court conduct a privacy analysis. The result was a wholesale ignoring of a central OPRA precept: "if there is doubt, give it out", derived from the idea that all gray areas, indeed anything but a clear cut applicable exemption, required the government to release the requested record.

OPRA not only ***requires*** "all government records shall be subject to public access unless exempt", but also ***specifically mandates*** exemptions from disclosure be narrowly construed: "any limitations on the right of access accorded by [OPRA] shall be construed in favor of the public's right of access." N.J.S.A. 47:1A-1. Thus, any OPRA exemption or limitation that is ambiguous must be interpreted in favor of access. Renna v. County of Union, 407 N.J. Super. 230, 238-39 (App. Div. 2009) Therefore, records must be clearly covered by a specific exclusion to prevent disclosure.

The Supreme Court again then stepped in, clarifying when the Doe/Burnett test was required in Brennan v. Bergen County Prosecutor's Office, 233 N.J. 330 (2018).

There is a very good reason the Defendants attempt reliance on lower federal courts interpretations of Doe to try and convince this appellate panel to do what they seek. The reason is that the New Jersey Supreme Court does not support what they argue. The denial of access to dog license records wilts when measured against the Supreme Court's directives in Brennan.

The Court was clearly attuned to the chronic over-assertion of the privacy exemption and the chaos it created by turning every OPRA request looking for a record containing addresses into OPRA cases with briefing resembling competing law review articles on privacy.

> *...We therefore find that, before an extended analysis of the Doe factors is required, a custodian must present a colorable claim that public access to the records requested would invade a person's* ***objectively reasonable expectation of privacy****.....When a claim of privacy falls short in that way, there is no need to resort to the Doe factors.* Brennan v. Bergen Cty. Prosecutor's Office, 233 N.J. 330, 342 (2018)

The "privacy" interest in home addresses relating to a dog license record just does not exist when the Supreme Court says courts supposed are to abide that....

> *...the Legislature has chosen to prevent disclosure of home addresses in select situations. Aside from those particular exemptions, however, OPRA does not contain a broadbased exception for the disclosure of names and home addresses that appear in government records.* Brennan, 233 N.J. at 238

And that is not even the first time the Court has expressly

rebuffed attempts to shield names and addresses from disclosure. In Higg-A-Rella, v. Essex, 141 N.J. 35, 49 (1995) the Court held names and addresses in public records are not subject to privacy interest ***and it did so even after the argument was abandoned***, obviously intending to keep the argument from recurring....

> *...Before this Court, defendants, represented by the Attorney General, have rescinded that argument [privacy vested in names and addresses]. We find that, given the very public nature of the information in the lists, defendants properly chose not to pursue the confidentiality/privacy claim. The State has no interest in confidentiality: The lists contain simple, non-evaluative data that have historically been available to the public, and that do not give rise to expectations of privacy.*

The only real question for Your Honors: is a dog license a routine - if not "run-of-the-mill" - government record? And how could it not be? There is nothing contained in that record a typical person has a vested interest in keeping secret. Is it *objectively reasonable* that someone would not think the people in the world would know that they own a dog? Dogs are outside on walks. They ride in the car. They go to the veterinarian among dozens of other places. They run loose in dog parks, are commonly found in restaurants and even shopping carts in stores. By the fact of their very existence, dogs are open and notorious to the world-at-large. No one is "ashamed" or potentially subject to ridicule or derision or discrimination for owning a dog. Owning a dog is not one of those things that is "legal" but

socially verboten. One cannot keep their dog hidden from the world, even with near Herculean efforts.

The types of things where one may hold "*an objectively reasonable expectation of privacy*" fall along the lines of what should be dubbed the "Miss Manners Test". The facets of existence that are protected as "private" in government records are the same things one should not discuss at dinner parties:

Politics
Religion
Personal Finances
Health
Sexual orientation or proclivities

...there may be more, but owning a dog could never be a private matter. And nor is your address, unless it explicitly connects someone to a matter where there is an "objectively reasonable expectation of privacy".

A dog license is routine government record that is not a record expressly exempt under OPRA and that it was not connected to data or information in which a person has an objectively reasonable expectation of privacy. Thus, as per Brennan there is no reason to conduct a Doe/Burnett analysis. *Contrast* Da9 & Da46

II. NEW JERSEY LAW DOES NOT CONTAIN ANY RESTRICTIONS ON REQUESTERS USING THE MATERIALS THEY ACQUIRE FOR COMMERCIAL PURPOSES

The Defendants twist and turn, to and fro, binding themselves to incorrect GRC decisions, decisions by federal

courts about other laws, and trying to hinge whether privacy is greater or lesser depending upon how the government obtained the information. In reality, Defendants are just against the fact the Plaintiff is going to use the material for send out mailers for invisible fencing.

First, starting with the common law right of access, the Supreme Court was very clear that commercial users cannot be denied access. To the contrary, it was very specific that commercial users seeking innocuous information like names, addresses and property ownership could utilize the common law. Higg-A-Rella v. Essex, 141 N.J. 35 (1995) That case has no structural difference from what Mr. Bozzi seeks here.

Second, turning to OPRA, it must be noted that Burnett v. Bergen, 198 N.J. 408 (2009)involved a commercial user looking to create a competing private title plant and use the records to solicit for things like mortgage refinancing. These intended commercial uses did not bother the Supreme Court at all.....

> ...As a general rule, we do not consider the purpose behind OPRA requests.....***An entity seeking records for commercial reasons has the same right to them as anyone else***.... Id. at 435

Further still, our Supreme Court has ***REFUSED*** to draw distinctions in records access based upon *the user*, yet that is EXACTLY what the Defendants seek to do here.

> ...Indeed, the suggestion is that this Court limit one's exercise of the statutory right to disclosure of documents pursuant to OPRA based upon an

> evaluation of the requestor's status. We have previously rejected such an approach in the context of the Right to Know Law, see Keddie v. Rutgers, 148 N.J. 36, 44, 689 A.2d 702 (1997), and find no basis for adopting a different approach to the clear language of OPRA. More to the point, were we to agree with the Attorney General's suggestion, we would be crafting a remedy that would be unenforceable as a practical matter. That is, were we to impose a limitation on the use of OPRA that applied to criminal defendants generally, they could easily evade it by employing others to make requests on their behalf. Kovalcik v. Somerset Co., 206 N.J. 581, 591 (2011)

Is a criminal defendant seeking information about the prosecutor's office *less* offensive to the interests embodied in OPRA than a law-abiding, New Jersey resident business man that pays his employees, his taxes, permitting fees, etc.? Of course not.

Nothing in OPRA limits it application to those using records for some undefined "public purpose". All limitations on access are supposed to be construed in favor of providing access. N.J.S.A. 47:1A-1 Where the statute imposes no limitation, neither the Defendants nor this Court have the province to create one.

Limiting access under OPRA to non-commercial users leads to the completely nonsensical result where explaining your interest in the materials when required (under the common law) then acts to bar access where no interest is required at all (OPRA). OPRA does not require an explanation of why the records are sought, so trying to use his enunciated purpose against him when he

articulates a legitimate LEGAL purpose is just silly. The records are open to any person - *even those out-of-state with no demonstrable interest or need in the records.* Scheeler v. Atlantic County Mun. Joint Ins. Fund, 454 N.J. Super. 621 (App. Div. 2018) The requester can be anonymous. N.J.S.A. 47:1A-5(f) The custodian cannot even inquire of the identity the records requester or their purpose for the records. And as the Court noted in Kovalcik, 206 N.J. at 591, attempts to do so are easily frustrated or circumvented. Mr. Bozzi could have just asked for the dog licenses and said nothing, that is true. But he want the dog licenses, not lawsuits, and he does not care whether the clerks gave him the records because of OPRA or the common law right of access.[1]

Even further, *the GRC itself instructs records custodians that there is no bar to access records for commercial use*:

SECTION 4 – SPECIAL CIRCUMSTANCES

Can a requestor seek access to government records under OPRA for commercial use?
There is no restriction against commercial use of government records under OPRA. See Spaulding v. County of Passaic, GRC Complaint No. 2004-199 (September 2006) and Burnett v. County of Bergen, 198 N.J. 408 (2009).

The New Jersey Open Public Records Act Handbook for Records Custodians, Fifth Edition, January 2011 pg. 30[2]

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[1] He now has the records from over 400 municipalities.

[2] Located here: https://www.state.nj.us/grc/pdf/Custodians%20Handbook%20(Updated%20January%202011).pdf

What the Defendants are after here is an even further parsing than the Supreme Court refused in Kovalcik. Defendants want to deny access to a narrow subset of commercial users who are obtaining records that can be used to solicit. If records cannot be denied to commercial users, why do we care what they do with the material? And "but-for" Bozzi's complete honesty, Defendants never would have, or could have, singled him out.

There is no prohibition on records being used for solicitation. Anyone who has ever gotten a speeding ticket or had a car accident knows that a dozen or more letters from lawyers will arrive within days. That happens because companies like LegalPlex submit requests to every town in the State every week.[3] In the grand scheme, Mr. Bozzi is the *least* offensive type of commercial use: he mails you a personalized brochure. He does not call you. He does not knock on your door. He does not aggregate and sell his gathered information to anyone because, of all things, he has to go to the appellate division to get it and wait two years. He has no incentive to share this information with his competitors.

The government does not get to decide what goes into

[3] Accident reports reveal more intrusive details than whether or not you own a dog - things like medical information, who your companions are, as well as connecting your id to an address, a car, a license plate number, a car's VIN number, an insurance company and a policy number, along with whatever law breaking you allegedly engaged in.

someone's mailbox. A records custodian does not get to decide whether they like what a record requester does with the material sought.

And who would ever decide whether the solicitation has a significant enough "public purpose"? And isn't that a function of how one frames the point? By Defendants' reckoning, Mr. Bozzi does not have a "pure" enough purpose because they frame it as using the material to "sell", but solicitation by charities and political groups are no different in goal (obtain money), and can be quite an affront to those who do not agree with their cause or viewpoint. Why would a brochure for a dog fence invade my privacy more than someone trying to challenge my private beliefs or fund beliefs opposite of my own? Where is the "public purpose" line drawn? Would a public purpose not include that it helps Bozzi keep 4 other New Jersey citizens employed? What about all of the permits he buys, the motor vehicle registration fees he pays? Certainly this is more of a "public purpose" than is exhibited in many of the OPRA requests initiated for political reasons. Or should we just allow access to charities - who then offer to sell the material to the likes of Mr. Bozzi anyway? (Da35) These Gordian-knot questions would not confound this court but for the Defendants' insistence whereby the records custodian becomes the gatekeeper of junk mail and arbiter of acceptable records usage. Thankfully, by the Supreme Court's mandated

analysis, these questions are never reached because.....

III. THE PRIVACY INTEREST IS MEASURED BY THE CONTENT OF THE RECORD SOUGHT, NOT WHAT THE REQUESTER WANTS TO DO WITH IT.

Under OPRA, it never matters what the requester does with the record because either the record contains material that exempts it from disclosure or it does not. If it does not contain exempt material, what the requester does with the record does not matter.

The Supreme Court unequivocally used Brennan v. Bergen Prosecutor's Office, 233 N.J. 330 (2018) to reinforce that the focus must be on the content of the record. Brennan directly lamented that courts were being called upon to weigh the Doe/Burnett factors for every conceivable assertion of "privacy", noting that "[n]either Burnett nor Carter, requires courts to analyze the Doe factors every time a party asserts a privacy factor exists". Id. at 341

Under existing case law, there is "privacy" inherent in your social security number and significantly detailed financial information.[4] These are things that can cause significant personal harm or loss. Names and addresses are not protected. The additional "identifier" involved here is whether or not a

[4] In Carter v. Doe, 230 N.J. 258, 280 (2017), someone's complete financial history was "private", while in Burnett mortgages and deeds, which have only some of a person's financial interests outlined, were not.

person owns a dog. This court cannot find that Mr. Bozzi learning someone owns a dog violates an "objectively reasonable expectation of privacy". Id. at 342 Whether or not there is an objectively reasonable expectation of privacy has nothing to do with the subjective wants of a particular citizen. Or records custodian for that matter.

Whether the material is voluntarily provided to the government or not is not the controlling determinant of there being a reasonable expectation of privacy. That is a foolish standard to apply, as almost nothing you give the government is really voluntary. Police write tickets to people and the list is then sold to lawyers to solicit municipal court work. You provide information on your property ownership (by recording your deed or mortgage) not to aid in being taxed but to protect your ownership in the chain of title and the government creates a tax roll from it, which is then sold. The government requires a building permit. These are all subject to disclosure.

And it is quite absurd for the government to assert privacy is inherent in a dog license when the State itself posts Mr. Bozzi's home improvement contractor license and all of his information online.[5] He is by law compelled to do that just as he is to license his dog. How is the privacy level possibly any different whether it is your dog, your business (including your

[5] https://www.njconsumeraffairs.gov/Pages/verification.aspx

law license) or your traffic tickets? Arguably, one should be more upset about revealing whatever nonsense they engaged in that got them dragged into municipal court than whether or not they own a dog.

Defendants fail to appreciate that an "***objectively reasonable*** expectation of privacy" is something that people reasonablely think is private. **The nature of privacy is not determined by how the government got the record or by what people want. It is determined by the nature of the information.** Owning a dog is not such a piece of information.

IV. THE GRC RULINGS ARE NOT ONLY MEANINGLESS, BUT WRONG

Defendants place a lot of emphasis on the GRC ruling in Berstein v. Park Ridge, GRC Complaint #2005-99.[6] That the GRC has previously decided a similar issue, indeed even an identical issue, is not controlling on this Court. N.J.S.A. 47:1A-5, the statute specifically states that **"a decision of the [GRC] shall not have value as a precedent for any case initiated in the Superior Court....** N.J.S.A. 47:1A-7(e)

Admittedly, Mr. Bernstein sought dog license records and was denied access. That decision, when analyzed by the law

[6] The GRC issued multiple rulings against Mr. Bernstein. They all track back to Bernstein v. Borough of Allendale, GRC Complaint #2004-195. That is the original case containing the full privacy discussion.

existing **then**, was wrong. There are several critical points the GRC simply "got wrong".

i. The GRC's reliance on Executive Order 21 was erroneous.

OPRA recognizes the exemptions from of access not only mentioned in the statute itself but also by "Executive Order of the Governor." N.J.S.A. 47:1A-9(a) The GRC's Bernstein decisions all trace back to ¶3 of Executive Order 21 to define how broadly to construe "the reasonable expectation of privacy" contained in the preamble of that same Executive Order and N.J.S.A. 47:1A-1. Paragraph 3 defined the "reasonable expectation of privacy" to include:

> *In order to effectuate the legislative directive that a public governmental agency has the responsibility and the obligation to safeguard from public access a citizen's personal information with which it has been entrusted, an individual's home address and home telephone number, as well as his or her social security number, shall not be disclosed by a public agency at any level of government to anyone other than a person duly authorized by this State or the United States, except as otherwise provided by law, when essential to the performance of official duties, or when authorized by a person in interest. Moreover, no public agency shall disclose the resumes, applications for employment or other information concerning job applicants while a recruitment search is ongoing, and thereafter in the case of unsuccessful candidates.* Executive Order 21, 34 N.J.R. 2487 (2002)

Executive Order 21 issued on July 8, 2002, the day after OPRA took effect. As OPRA was intended to ***increase*** public

access, the provisions of Executive Order 21 that exempted all documents with an address caused an immediate uproar. OPRA made documents more accessible than the prior Right-To-Know law and then Executive Order 21 took the restrictions backwards more than a century. *See generally*, Lum v. McCarty, 39 N.J.L. 287 (E.&A. 1877); Barber v. West Jersey Title & Guaranty, 53 N.J. Eq. 158 (E. & A. 1895) (allowing public access to title records, which contain, *inter alia*, addresses) Following extensive public backlash, a month later Governor McGreevey then ***rescinded*** ¶ 3 of Executive Order 21 when he issued Executive Order 26, 34 N.J.R. 3043(b) (2002) on August 13, 2002. Executive Order 26 also rescinded ¶ 2 of Executive Order 21. In Slaughter v. GRC, 413 N.J. Super. 544 (App. Div. 2010), the appellate division dispatched ¶ 4 of Executive Order 21. **All** substantive provisions of Executive Order 21 have now been rescinded or nullified (and all relevant provisions were rescinded 30 months *before* the GRC rendered the first Bernstein decision. The GRC incorrectly defined the privacy analysis from a starting point recognized to not be the proper public policy more than 2 years earlier.

ii. The privacy interest in public records was *never* as broad as the GRC interpretation in *Bernstein*.

The GRC analysis regarding the privacy interest in public records was simultaneously both truncated and over-expansive. The GRC decision in Bernstein incorrectly determined that Doe v.

Poritz, 142 N.J. 1, 82 (1995) stood for the premise that records connecting a name and address created an insurmountable privacy interest. **That is not what Doe v. Poritz stood for at all!**

Doe was a myriad of challenges to Megan's Law, which had two relevant parts:

-the Registration law, which allowed the government to maintain and disclose the list when requested; and

-the Notification law, which was active dissemination by the government of the information.

Contrary to the GRC's analysis of Doe, the Supreme Court took no issue at all with the release of a criminal's history connected with the name and address, Id. at 79, and specifically held there was no "privacy interest" in people learning someone was on the sex offender registry. Id. at 82[7] The "privacy interest" that existed was recognized **only** with regard to the-affirmative-steps-initiated-by-the-government-to-disseminate-information inherent in the Notification Law. Id. at 84 And even then, active notification was upheld (with required pre-dissemination judicial approval). Id. 91 There were concerns that the "invasive conduct" being directed at the offenders was harassment and vigilantism, and yet that was not enough to exalt the privacy interest over public availability of the names and addresses.

[7] In fact, the State Police maintain a website to access that information: http://www.njsp.org/sex-offender-registry/index.shtml

Notably, neither the Bernstein GRC case nor this one involve affirmative government dissemination of information like the Notification Law, but rather provision of information requested by citizens just like the Registration Law. It is simply defies all common sense that the ***very real*** threat of vigilante justice against a sex offender does not result in a violation of privacy, but a direct mail postcard from a contractor regarding a dog fence would. The GRC's Bernstein decisions were simply a bad ruling based upon a misunderstanding of the case. The GRC treated *dicta* about general privacy standards more expansively than the Supreme Court treated the (very significant) privacy claims that were made in Doe.

The logic proffered by the GRC for not disclosing names and addresses makes even less sense when one considers that only 6 days before the Doe v. Portiz decision (issued July 25, 1995), the Supreme Court specifically ruled in Higg-A-Rella, v. Essex, 141 N.J. 35 (1995) (July 19, 1995) that the names and addresses in public records are not subject to a privacy interest.

There is no dispute that ALL of the GRC's privacy-based rulings trace back to a reliance on Executive Order 21, 34 N.J.R. 2487 (2002) which had already been rescinded for 2 years (!!) before the GRC ever put pen to paper. It is impossible for the GRC to arrive at a correct conclusion about the law and where it stands when it is applying expressions of policy the government

has already determined to not be accurate. And the GRC's interpretation of Doe v. Poritz, 142 N.J. 1 (1995) is simply not correct. **Accepting the GRC's logic means this Court is adopting this position: The risk of harm from a dog owner being mailed a brochure about dog fencing is GREATER that the risk of vigilantes exacting revenge on a sex offender.**

The GRC has declared itself the "determiner of proper use" of government records, effectively creating a series of "law-ish" holdings that people seeking records for *some* commercial purposes will be denied access. All of those GRC decisions are based upon a premise that the GRC acts like some sort of gatekeeper to prevent unsolicited contact or junk mail, BUT THAT IS NOT THE LAW. The Supreme Court has clearly directed that...

> *The issue here is not whether plaintiff has a privacy interest in his address, but whether the inclusion of plaintiff's address, along with other information [dog ownership in this case], implicates any privacy interest.* Doe v. Poritz, 142 N.J. 1, 83 (1995)

The GRC "opinions" that claim otherwise are not in line with what our courts, indeed our Supreme Court, have said. To restrict records access based upon a near hysterical opposition to commercial solicitation is not how the law works.

V. DEFENDANTS' ENTIRE COMMON LAW ARGUMENT IS NOTHING BUT SPECULATION AND COMPLETELY OMITS DISCUSSION OF THE CONTROLLING PRECEDENT.

Defendants concede the documents are public records. Defendants then contend that Mr. Bozzi's expressed intent to utilize the records for commercial solicitation purposes is somehow not "legitimate". Db21 Defendants do not say how or why this is so. Nor do Defendants ever mention Higg-A-Rella, v. Essex, 141 N.J. 35 (1995) which holds that use of public records for commercial purposes is a "legitimate private interest" and which involved the use of records to create a mailing list, just as Mr. Bozzi seeks to do here. All Defendants profess regarding the government's interest in confidentiality is the speculation that people will not register their dogs and a parade of horribles will fall from that. The law does not allow Defendants to defeat a Supreme Court-recognized legitimate private interest with a mere "guess". Let's suppose Mr. Bozzi did not want to register his business and be licensed by the State because he did not want his information posted on the internet by the Department of Community Affairs. He would then be subject to enforcement proceedings because the Consumer Fraud Act related regulations require that he register. If Jersey City residents start ignoring the requirement to register their dogs, ENFORCE THE LAW.

CONCLUSION

This Court should determine dog licenses are a routine government record, not one subject to the Doe/Burnett analysis, and uphold the release. The reasoning is that dog ownership is not something in which an "objectively reasonable expectation of privacy" attaches. To the extent there is any privacy interest at all, there is no "real and significant harm" arising from knowing someone owns a dog. My name is Donald M. Doherty, Jr.. I live at 708 North Ocean St., Ocean City, NJ 08226. I own a mutt named Cheeca. What evil does knowledge of Cheeca's existence allow you to commit that you could not undertake from learning about a name and address in the property tax rolls or even a phone book? You are not going to come to try and steal Cheeka, because you don't know what kind of dog she is. And if you just want any random dog are you going to make an OPRA request to find who owns one or just go to the pound and pick out one you like for free? Are you going to mail me a brochure for an invisible fence? Ask me to sign a petition to build a dog park? Send me a notice that you are a new veterinarian in town? *And what of those is a "real and significant harm"?*

And should this court ever reach a conclusion that a dog license is not a routine government record *and* there is an objectively reasonably expectation of privacy in owning a dog then and only then are the Doe factors are applied. When doing

so, it is impossible to escape the analysis from the Appellate Panels evidenced in the AC-SPCA (Da9) and Bolkin (Da24) cases - there is still no way around the release of these records because *dog ownership is not a significant personal identifier* and no risk of harm has been articulated other than speculation about people not wanting to register their dogs.

Defendants portend release of the dog license records would violate privacy. As per the above legal analysis, that is just not so. But if Jersey City were so concerned about privacy for its residents (from mail?), Brennan exposes where the Defendants have failed their residents: The Privacy Commission outlined that the solution to concerns over privacy were mollified by allowing by allowing a citizen to provide a mailing address in addition to a home address. Brennan, 233 N.J. at 339 If Defendants really wanted to protect their citizens, they could add another line to the form for a separate mailing address, do not block OPRA requests that seek routine documents with an address. The dog licensing statute, N.J.S.A. 4:19-15.5 even specifically allows for that because it directs the collect of the street and mailing (post office) addresses.

Respectfully submitted,
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