

SUPREME COURT OF NEW JERSEY

Alex Rosetti v. Ramapo-Indian Hills Regional High School Board of Education and Thomas Lambe, in his official capacity as Records Custodian

A-72-24 (090375) (N.J. June 11, 2026) · No. A-72-24 (090375) · Decided June 11, 2026

SUMMARY

The Supreme Court of New Jersey held that logs of government-related emails located in Board members’ personal email accounts are government records subject to disclosure under the Open Public Records Act. The Court affirmed as modified the Appellate Division’s judgment, clarifying that only logs of government-related emails—not entire personal email accounts—are subject to disclosure. The Board and its members must search the personal accounts, produce responsive logs, and certify the searches conducted.

CASE DETAILS

COURT	Supreme Court of New Jersey
WRITING FOR THE COURT	Justice Pierre-Louis; Chief Justice Rabner; Justice Patterson; Justice Wainer Apter; Justice Fasciale; Justice Noriega; Justice Hoffman
JURISDICTION	Supreme Court of New Jersey
DECIDED	June 11, 2026
DOCKET	A-72-24 (090375)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Certification appeal from the Appellate Division's reversal of a trial court order denying an Open Public Records Act request for email logs from Board members' personal email accounts.
STANDARD OF REVIEW	De novo review applies to legal determinations concerning the applicability of OPRA and its exemptions.
PRECEDENTIAL VALUE	Published, precedential opinion of the Supreme Court of New Jersey
PARTIES	Ramapo-Indian Hills Regional High School Board of Education, Thomas Lambe, in his official capacity as Records Custodian v. Alex Rosetti

TOPICS

administrative law

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statutory interpretation

appellate procedure

standard of review

PRACTICE AREAS

Open Public Records Act

administrative law

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municipal and school board records

QUESTIONS PRESENTED

1. Whether logs of government-related emails contained in Board members' personal email accounts are government records subject to disclosure under OPRA.
2. Whether OPRA requires the Board and its members to search personal email accounts and create logs of government-related emails when an electronically generated server log is unavailable.
3. Whether Rosetti's request for email logs from Board members' personal email addresses was overbroad.
4. What search and certification procedures are required to satisfy the Board's OPRA obligations.

HOLDINGS

1. Logs limited to government-related emails contained in Board members' personal email accounts are government records subject to disclosure under OPRA, regardless of whether the accounts are personal or maintained on private servers.
2. The Board and its members must search their personal email accounts, or use another acceptable method that yields the Board-related emails, to create logs of government-related emails responsive to Rosetti's request.
3. Only logs of government-related emails are government records under OPRA; logs of entire personal email accounts are not government records merely because some messages in those accounts concern government business.

KEY QUOTATIONS

“Applying those principles, we hold that the Board must produce logs of government-related emails found within the Board members’ private email accounts.” (18)

“We agree with Rosetti that such a log would be acceptable and responsive to his OPRA request and hold that the Board and its members must search their personal email accounts in this manner, or by any other acceptable method that will yield the Board-related emails, in order to create logs of government-related emails housed in those personal email accounts.” (20-21)

“It is only the log of government-related emails that is a government record.” (22)

“The Appellate Division’s judgment is affirmed as modified.” (23)

FACTUAL BACKGROUND

In January 2023, Alex Rosetti requested from the Ramapo-Indian Hills Regional High School Board of Education email logs for Board members' accounts used to conduct or discuss Board business. The Board produced a redacted log from Board-issued accounts but did not produce logs from personal accounts that

members used for Board business. The Board's technology director stated that generating logs from personal accounts would be difficult or impossible, while Rosetti proposed that Board members search their own inboxes, sent items, trash, and other folders for Board-related messages.

PROCEDURAL HISTORY

Rosetti submitted an OPRA request seeking, among other records, email logs for Board members' government-related communications from both Board-issued and personal email accounts. The Board produced a redacted log from its government email accounts but declined to produce logs from personal accounts. The trial court denied Rosetti's request for the personal-account logs. The Appellate Division reversed and held that logs of Board-related emails in personal accounts were subject to OPRA. The Supreme Court granted certification and affirmed as modified.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The Board and its members must search personal email accounts for government-related emails and produce responsive logs. They must submit certifications describing the searches conducted so a trial or appellate court can determine whether proper searches were completed. Unrelated personal emails appearing in a responsive log must be redacted.

CASES CITED

- Paff v. Galloway Township, 229 N.J. 340 (2017)
- Simmons v. Mercado, 247 N.J. 24 (2021)
- Wilson v. Brown, 404 N.J. Super. 557 (App. Div. 2009)
- City of San Jose v. Superior Court, 389 P.3d 848 (Cal. 2017)
- Toensing v. Attorney General of Vermont, 178 A.3d 1000 (Vt. 2017)
- Educ. L. Ctr. v. Dep't of Educ., 198 N.J. 274 (2009)
- N. Jersey Newspapers Co. v. Passaic Cnty. Bd. of Chosen Freeholders, 127 N.J. 9 (1992)
- Mason v. City of Hoboken, 196 N.J. 51 (2008)
- Asbury Park Press v. Ocean Cnty. Prosecutor's Off., 374 N.J. Super. 312 (Law Div. 2004)
- ACLU of N.J. v. Cnty. Prosecutors Ass'n of N.J., 257 N.J. 87 (2024)
- In re N.J. Firemen's Ass'n Obligation, 230 N.J. 258 (2017)
- Firemen's Ass'n, 230 N.J. 258 (2017)
- Gilleran v. Township of Bloomfield, 227 N.J. 159 (2016)
- Rosetti v. Ramapo-Indian Hills Reg'l High Sch. Bd. of Educ., 481 N.J. Super. 1 (App. Div. 2025)
- Paff v. Department of Labor, 392 N.J. Super. 334 (App. Div. 2007)

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