

Benjamin Shore
 Pro Se Plaintiff
 20 Brace Rd Suite 325
 Cherry Hill, NJ 08034
 Phone: 215-627-6458
Sunny@BenShoreLaw.com

**SUPERIOR COURT OF NEW JERSEY
 CAMDEN COUNTY**

Benjamin Shore,	:	
	:	
Plaintiff,	:	
	:	
	:	Civil Action
	:	
v.	:	DOCKET NO.: _____
	:	
	:	
JASON SCHIMPF, in his official capacity as Records Custodian and CHERRY HILL TOWNSHIP BOARD OF EDUCATION,	:	
	:	
Defendants.	:	

VERIFIED COMPLAINT

Benjamin Shore, pro se, hereby states:

PRELIMINARY STATEMENT

1. This case is about a simple point: a public body held a public meeting, it created or maintained video records of that meeting, and it cannot replace the public's right of access with a take-it-or-leave-it demand that a requester travel in person to watch the record under the agency's control.
2. Plaintiff requested a short segment of security-camera footage capturing the Cherry Hill Township Board of Education meeting held on December 16, 2025, during the "Cherry

Hill Tomorrow Project Update,” including a reasonable buffer before and after the segment. In the total the footage is around 5 to 10 minutes. *Exhibit P1*.

3. Defendants refused to provide any electronic copy of the requested government record. Defendants insisted that Plaintiff may only view the footage in person through a secluded process at District offices. Defendants also refused each and every proposed redactions and other safeguards that would address any legitimate security concern. *Exhibit P2*.
4. Plaintiff seeks an order compelling disclosure, with reasonable redactions if the Court finds a narrow portion is lawfully exempt, and all other appropriate relief.

IDENTIFICATION OF PARTIES

5. Plaintiff Benjamin Shore is an individual. Plaintiff is a journalist and the founder and chief editor of Shore Investigates, an independent news outlet focused on government transparency and public accountability.
6. Defendant Cherry Hill Township Board of Education (“Board” or “District”) is a public agency subject to the New Jersey Open Public Records Act (“OPRA”), N.J.S.A. 47:1A-1 et seq., and the common law right of access.
7. Defendant Jason Schimpf is the District’s Custodian of Records (and/or a person acting on behalf of the Custodian), and communicated the District’s denial and conditions of access. He is sued in his official capacity only.

JURISDICTION, VENUE, AND SUMMARY ACTION

8. This Court has jurisdiction under OPRA, including N.J.S.A. 47:1A-6, and under the Court’s authority to enforce the common-law right of access.
9. Venue is proper in Camden County because the District is located in Camden County and the records at issue are maintained there.

STATEMENT OF UNDISPUTED FACTS

10. On December 16, 2025, the Board held a public Board of Education meeting open to the public and publicly attended.

11. During that meeting, the District presented the “Cherry Hill Tomorrow Project Update.” The District’s presentation included visuals depicting school facilities and security-related design features. Plaintiff’s request seeks the meeting-room recording of that public meeting segment, not internal security plans.
12. On January 9, 2026, Plaintiff submitted an OPRA and common-law request to the District seeking security-camera footage from the December 16, 2025 meeting during that presentation, including a reasonable buffer immediately before and after, and including footage from any camera angle that captured the dais/Board members and/or the public audience during that segment. *Exhibit P1*.
13. Plaintiff explained that the request was for news media purposes, and that he was seeking a limited clip of public officials during a public meeting. *Id*.
14. The District denied Plaintiff’s request to receive an electronic copy of the video. The District stated it would not provide an electronic copy but offered Plaintiff the opportunity to view the footage in person at the District offices. *Exhibit P2*.
15. The District justified its refusal by claiming that releasing the footage would reveal “capabilities and vulnerabilities” of the District’s security system, including coverage levels, potential blind spots, image and resolution quality, whether cameras record in color or black and white, and whether audio is captured. *Id*.
16. Defendants did not identify any OPRA exemption or other legal authority as the basis for withholding. Defendants’ denial did not cite any statute, regulation, Executive Order, court rule, or other source of law, and did not “indicate the specific basis” for noncompliance as OPRA requires. N.J.S.A. 47:1A-5(g). *Id*.
17. Plaintiff objected and proposed commonsense safeguards to address each concern, including reasonable redactions and limitations such as cropping the frame, lowering resolution, providing black-and-white video, and providing video without audio. *Id*.
18. Plaintiff even offered to pay a special service charge to have redactions performed to address each and every risk the District lists. *Id*.
19. The District refused to consider these safeguards and maintained its position: in-person viewing only, no electronic copy, unless “ordered otherwise by a court of law.” *Id*.
20. If the Court orders disclosure, Defendants will provide the footage.

21. Plaintiff attempted further compromise. Plaintiff indicated willingness to proceed with a controlled private viewing, but asked the District to provide that same controlled viewing virtually because he was not in New Jersey and travel would take hours. Plaintiff also requested that the District treat the request for virtual viewing as a reasonable accommodation while he was ill. The District refused this reasonable accommodation request. *Id.*
22. Plaintiff obtained security camera footage from 10 other public school districts in New Jersey for their Board meetings. This undercuts the District's position that the only lawful option is a categorical refusal to provide a copy of any footage from a public meeting. *Exhibit P3.*
23. Plaintiff also obtained security camera footage from the Cherry Hill Township meeting. *Exhibit P3.*

COUNT I
Violation of OPRA, N.J.S.A. 47:1A-1

24. Plaintiff repeats and realleges previous paragraphs as if fully set forth here.
25. The requested footage is a "government record" within the meaning of OPRA because it is information made, maintained, or kept on file in the course of official business by a public agency.
26. Under OPRA, "A custodian shall permit access to a government record **and provide a copy** thereof **in the medium requested[.]**" The District refused to provide a copy in the medium requested.
27. Against the Legislatures' command, the Board invented a new OPRA rule offering a private showing, when the legislature clearly and explicated **intended both** access and copies to record.
28. The District unlawfully denied access by refusing to produce the record in any electronic form and insisting that Plaintiff may only view the record in person under District-controlled conditions, which is not the access OPRA guarantees.
29. To the extent the District contends a narrow portion is exempt, OPRA requires a lawful, specific basis for withholding, and any non-exempt portion must be disclosed with

reasonable redactions where appropriate. Plaintiff proposed multiple redaction and safeguard options that the District refused.

30. OPRA also requires that when a custodian is unable to comply with a request for access, the custodian must “indicate the specific basis” for the denial. N.J.S.A. 47:1A-5(g). Defendants’ denial did not cite any statute, regulation, Executive Order, court rule, or other source of law, and did not “indicate the specific basis” for noncompliance as OPRA requires.
31. Plaintiff is entitled to injunctive and declaratory relief compelling disclosure, and to all remedies available under OPRA, including costs as permitted by law.

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- A. Declaring that Defendants’ denial violates OPRA;
- B. Ordering Defendants to produce the requested footage promptly in electronic form, subject only to reasonable, narrowly tailored redactions if the Court finds any portion lawfully exempt;
- C. Awarding Plaintiff costs under Rule 4:42-8(a); *see also Mills v. Div. of State Police*, A-5356-18T2, 2020 WL 4431746, at *6 (N.J. Super. Ct. App. Div. Aug. 3, 2020).
- D. Ordering Defendants to issue a legally sufficient OPRA response that identifies the specific exemption(s) and legal authority relied upon for any withholding or limitation on access.
- E. Granting such other and further relief as the Court deems just and equitable.

COUNT II

Violation of Plaintiff’s Common Law Right To Access Public Documents

32. Plaintiff repeats and realleges previous paragraphs as if fully set forth here.
33. The requested footage is a public record subject to the common-law right of access.
34. Plaintiff has a legitimate interest in the record, including news reporting about how public officials conduct public business at a public meeting.
35. The District’s blanket refusal to provide any electronic copy, and its insistence on in-person-only viewing, is not narrowly tailored. If the Court finds any portion raises legitimate security concerns, the appropriate remedy is reasonable redaction and disclosure of the remainder.

36. The District did not make any mention as to the denial under the common law.
37. “OPRA does not limit the common law right of access to government records[.]” *Mason v. City of Hoboken*, 196 N.J. 51, 67 (2008).

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- A. Declaring that Plaintiff is entitled to access under the common law;
- B. Ordering prompt disclosure with reasonable redactions if needed;
- C. Awarding Plaintiff costs under Rule 4:42-8(a); *see also Mills v. Div. of State Police*, A-5356-18T2, 2020 WL 4431746, at *6 (N.J. Super. Ct. App. Div. Aug. 3, 2020).
- D. Granting such other and further relief as the Court deems just and equitable.

REQUEST FOR INSURANCE INFORMATION PURSUANT TO R.4:10-2(b)

Defendants are hereby requested to provide copies of any and all policies of insurance which may provide coverage for the claims and causes of action contained in this complaint.

Request for Oral Arguments

Plaintiff, Benjamin Shore respectfully request oral arguments.

Trial Counsel Designation

The undersigned will appear pro se.

By: /S/Benjamin Shore
Benjamin Shore
Pro Se Plaintiff
Dated: February 10, 2026

R. 4:5-1 CERTIFICATION

I, Benjamin Shore hereby certify the following:

- 1. I am appearing pro se.
- 2. To the best of my knowledge and belief, this matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any such

proceeding contemplated at this time.

3. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

By: /S/Benjamin Shore
Benjamin Shore
Pro Se Plaintiff
Dated: February 10, 2026

VERIFICATION

I, Benjamin Shore, of full age, hereby certify and declare as follows:

1. I am the Plaintiff in the above-captioned matter.
2. I have read the contents of the Verified Complaint and know the facts contained therein.
3. The factual allegations contained in the Verified Complaint are true and accurate to the best of my knowledge, information, and belief.
4. The Verified Complaint is made in truth and good faith, without collusion, and for the reasons stated therein.
5. As to any matters alleged on information and belief, I believe those matters to be true.
6. All documents attached to the Verified Complaint, if any, are true and complete copies of the originals and have not been altered or modified, unless otherwise indicated.

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

Respectfully Submitted,

By: /S/Benjamin Shore
Benjamin Shore
Pro Se Plaintiff
Dated: February 10, 2026

20 Brace Rd Suite 325
Cherry Hill, NJ 08034
Phone: 215-627-6458
Sunny@BenShoreLaw.com

Benjamin Shore
 Pro Se Plaintiff
 20 Brace Rd Suite 325
 Cherry Hill, NJ 08034
 Phone: 215-627-6458
Sunny@BenShoreLaw.com

**SUPERIOR COURT OF NEW JERSEY
 CAMDEN COUNTY**

Benjamin Shore,	:	
	:	
Plaintiff,	:	
	:	
	:	Civil Action
	:	
v.	:	DOCKET NO.: _____
	:	
	:	
JASON SCHIMPF, in his official	:	
capacity as Records Custodian	:	
and CHERRY HILL TOWNSHIP	:	
BOARD OF EDUCATION,	:	
	:	
Defendants.	:	

ORDER TO SHOW CAUSE

THIS MATTER having been brought before the Court by Benjamin Shore, appearing pro se, on the Verified Complaint filed pursuant to the New Jersey Open Public Records Act (“OPRA”), *N.J.S.A.* 47:1A-1 et seq., and the common law right of access to public records, seeking relief by way of summary action under *R.* 4:67-1, and for good cause shown,

IT IS on this ____ day of _____, 2026, ORDERED that Defendants, Cherry Hill Township Board of Education and Jason Schimpf, in his official capacity as Records Custodian,

shall appear before this Court on the ____ day of _____, 2026, at ____ AM/PM, or as soon thereafter as counsel can be heard, at the Superior Court of New Jersey, Camden County, to show cause why an Order should not be entered:

1. Declaring that Defendants violated the New Jersey Open Public Records Act ("OPRA"), *N.J.S.A.* 47:1A-1 et seq., by: improperly denying access to public records
2. Declaring that Defendants' denial also violates Plaintiff's common law right of access, as the footage is a public record and the public interest outweighs any claimed security concerns.
3. Ordering Defendants to immediately produce the requested public records.
4. Awarding Plaintiff court costs.
5. Imposing civil penalties under *N.J.S.A.* 47:1A-11 against District's custodian as the conduct was willful and knowing, or made in bad faith.
6. Granting any other relief this Court deems just and equitable.

AND IT IS FURTHER ORDERED that:

1. A copy of this Order to Show Cause, Verified Complaint and all supporting affidavits or certifications submitted in support of this application be served upon Defendants personally or by Certified Mail, Return Receipt Requested, within 7 days of the date the Plaintiff received this Order, in accordance with R. 4:4-3 and R. 4:4-4, this being original process; Given that Plaintiff and Defendants have consistently communicated regarding this OPRA request and prior OPRA requests via electronic mail, and in the interest of judicial efficiency and expediting service, the Parties may also effectuate service via electronic mail to the email address previously used for correspondence. Service by electronic mail is reasonably calculated to provide actual notice to

Defendants, as it aligns with the established course of dealings between the parties and is the primary method by which Defendants have previously acknowledged and responded to OPRA requests.

2. The Plaintiff must file with the court its proof of service of the pleadings on the Defendants no later than three (3) days before the return date;

3. Defendants shall file and serve a written answer and opposition papers to this Order to Show Cause and the relief requested in the Verified Complaint and proof of service of the same by _____, 2026. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and courtesy copies of the papers must be sent directly to the chambers of the Honorable _____ via MAIL/EMAIL/ECOURTS. A copy must be served on Plaintiff that same date.

4. The Plaintiff must file and serve any written reply to the Defendants' opposition to the Order to Show Cause by _____, 2026. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and copies of the reply papers must be sent directly to the chambers of the Honorable _____ via MAIL/EMAIL/ECOURTS.

5. If the Defendants do not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the Plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

6. If Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date must be submitted to the Court no later than three (3) days before the return date.

7. Defendants take notice that the Plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of

the lawsuit. If you dispute this complaint, you, or your attorney, shall file a written answer and opposition papers and proof of service before the return date of the order to show cause. These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at <http://www.judiciary.state.nj.us/prose/10153deptyclerklawref.pdf>. Include a \$175 filing fee payable to the “Treasurer State of New Jersey.” You must also send a copy of your Answer and opposition papers to the Plaintiffs’ attorney whose name and address appear above, or to the Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your answer and opposition papers (with the fee) or judgment may be entered against you by default.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJLAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at <http://www.judiciary.state.nj.us/prose/10153deptyclerklawref.pdf>.

9. The Court will entertain argument and testimony, on the return date of the Order to Show Cause.

HON. _____

Benjamin Shore
 Pro Se Plaintiff
 20 Brace Rd Suite 325
 Cherry Hill, NJ 08034
 Phone: 215-627-6458
Sunny@BenShoreLaw.com

**SUPERIOR COURT OF NEW JERSEY
 CAMDEN COUNTY**

Benjamin Shore,	:	
	:	
Plaintiff,	:	
	:	
	:	Civil Action
	:	
v.	:	DOCKET NO.: _____
	:	
	:	
JASON SCHIMPF, in his official capacity as Records Custodian and CHERRY HILL TOWNSHIP BOARD OF EDUCATION,	:	
	:	
	:	
Defendants.	:	

**[PROPOSED] ORDER GRANTING SUMMARY RELIEF UNDER OPRA AND THE
 COMMON LAW RIGHT OF ACCESS**

This matter having come before the Court on Plaintiff's application for relief under the Open Public Records Act, N.J.S.A. 47:1A-1 to -13, and the Court having considered the submissions and arguments of the parties, and for good cause shown;

IT IS on this ____ day of _____ 2026, ORDERED:

1. **Disposition of OPRA Request.** Plaintiff's application for access is:
 - ☐ **Granted**
 - ☐ **Denied**
 - ☐ **Granted in part and denied in part**, as set forth on the record or as follows:

2. **Relief (if granted or granted in part).** Defendants shall provide access to the requested record(s) as follows (if applicable):

Deadline for compliance: _____

3. **Costs (R. 4:42-8(a)).** Plaintiff's request for costs is:
[] **Granted** pursuant to **R. 4:42-8(a)** in the amount of \$_____, or as taxed by the Clerk upon submission of a Bill of Costs. See also **Mills v. Div. of State Police**, A-5356-18T2, 2020 WL 4431746, at *6 (N.J. Super. Ct. App. Div. Aug. 3, 2020).
[] **Denied**
[] **Reserved**, pending submission of a Bill of Costs within _____ days.
4. **Additional Relief (if any).**

SO ORDERED.

HON. _____

Benjamin Shore
Pro Se Plaintiff
20 Brace Rd Suite 325
Cherry Hill, NJ 08034
Phone: 215-627-6458
Sunny@BenShoreLaw.com

**SUPERIOR COURT OF NEW JERSEY
CAMDEN COUNTY**

Benjamin Shore,

:

:

Plaintiff,

:

:

:

Civil Action

:

v.

:

DOCKET NO.: _____

:

:

**JASON SCHIMPF, in his official
capacity as Records Custodian
and CHERRY HILL TOWNSHIP
BOARD OF EDUCATION,**

:

:

:

:

Defendants.

:

MOTION IN SUPPORT OF ORDER TO SHOW CAUSE

February 10, 2026

TO:

VIA ECOURTS:

Clerk, Camden County Superior Court
Civil Processing, Hall of Justice, First Floor
101 South 5th Street
Camden, NJ 08103

VIA ECOURTS:

Honorable Judge Mikulski
Camden County Superior Court
101 South 5th Street, Floor 1
Camden, New Jersey 08103

VIA ECOURTS and EMAIL:

Christina M. Michelson, Esq.

Methfessel & Werbel, Esqs.

2025 Lincoln Highway, Suite 200

Edison, NJ 08817

Email: michelson@methwerb.com

Tel: (732) 248-4200

Attorney for Defendants Cherry Hill Public Schools and Jason Schimpf.

Enclosed please find the following:

1. Verified Complaint and application for Order to Show Cause (summary action);
2. Certification(s), with exhibits;
3. Proposed Order;
4. Certificate of Service;
5. Brief in Support of Verified Complaint and Application for Order to Show Cause.

PLEASE TAKE NOTICE that on the next available return date, or on such date as the Court directs, Plaintiff Benjamin Shore will apply to the Superior Court of New Jersey, Law Division, Camden County, for entry of an Order to Show Cause and expedited relief under OPRA, N.J.S.A. 47:1A-1 et seq., and the common law right of access.

Relief requested:

1. Declaring that Defendants' denial violates OPRA;
2. Declaring that Defendants' denial violates the Common Law right of access;
3. Ordering Defendants to produce the requested footage promptly in electronic form, subject only to reasonable, narrowly tailored redactions if the Court finds any portion lawfully exempt;
4. Awarding Plaintiff costs under Rule 4:42-8(a); see also *Mills v. Div. of State Police*, A-5356-18T2, 2020 WL 4431746, at *6 (N.J. Super. Ct. App. Div. Aug. 3, 2020).
5. Ordering Defendants to issue a legally sufficient OPRA response that identifies the specific exemption(s) and legal authority relied upon for any withholding or limitation on access.
6. Granting such other and further relief as the Court deems just and equitable.

Pursuant to *R. 1:6-2(d)* the undersigned requests oral argument only if opposition to the within motion is entered.

Respectfully Submitted,

By: /S/Benjamin Shore

Benjamin Shore

Dated: February 10, 2026

Benjamin Shore
 Pro Se Plaintiff
 20 Brace Rd Suite 325
 Cherry Hill, NJ 08034
 Phone: 215-627-6458
Sunny@BenShoreLaw.com

**SUPERIOR COURT OF NEW JERSEY
 CAMDEN COUNTY**

Benjamin Shore,	:	
	:	
Plaintiff,	:	
	:	
	:	Civil Action
	:	
v.	:	DOCKET NO.: _____
	:	
	:	
JASON SCHIMPF, in his official	:	
capacity as Records Custodian	:	
and CHERRY HILL TOWNSHIP	:	
BOARD OF EDUCATION,	:	
	:	
Defendants.	:	

CERTIFICATION

I, Benjamin Shore, of full age, certify:

1. I am the plaintiff in this action.
2. The documents attached to this filing are true and authentic copies to the best of my knowledge.

I hereby 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 by law.

Respectfully Submitted,
By: /S/Benjamin Shore
 Benjamin Shore
 Dated: February 10, 2026

Benjamin Shore
Pro Se Plaintiff
20 Brace Rd Suite 325
Cherry Hill, NJ 08034
Phone: 215-627-6458
Sunny@BenShoreLaw.com

**SUPERIOR COURT OF NEW JERSEY
CAMDEN COUNTY**

Benjamin Shore,

:

:

Plaintiff,

:

:

:

Civil Action

:

v.

:

DOCKET NO.: _____

:

:

**JASON SCHIMPF, in his official
capacity as Records Custodian
and CHERRY HILL TOWNSHIP
BOARD OF EDUCATION,**

:

:

:

:

Defendants.

:

PLAINTIFF'S BRIEF IN SUPPORT OF ORDER TO SHOW CAUSE

Benjamin Shore
20 Brace Rd, Suite 325
Cherry Hill, NJ 08034
Phone: 215-627-6458
Sunny@BenShoreLaw.com

PRELIMINARY STATEMENT

This case is about a public agency attempting to manufacture a “security” exemption that does not exist. The Cherry Hill Township Board of Education (the “Board”) claims that releasing security camera footage of a public meeting in a public auditorium would catastrophically compromise school safety. That claim is demonstrably false for three reasons.

First, the Board is an outlier. **Ten other New Jersey public school districts have already produced the same type of record**, security camera footage of Board of Education meetings, to Plaintiff.¹ If the routine release of Board meeting footage truly created the catastrophic risk the Board now claims, those districts would not have produced it. **Cherry Hill stands alone, not because the law is unclear, but because the Board is choosing secrecy over transparency.**

Second, Courts across the country, from New Jersey’s own Appellate Division to the Supreme Court of Pennsylvania, the Supreme Court of Washington, and the Colorado Court of Appeals, have ordered disclosure of security camera from schools under public records law. *See Zezza v. Evesham Twp. Bd. of Educ.*, A-0537-21, 2023 WL 4248732, (N.J. Super. Ct. App. Div. June 29, 2023); *Easton Area Sch. Dist. v. Miller*, 232 A.3d 716, (Pa. 2020) (requiring disclosure of school security footage.); *Lindeman v. Kelso Sch. Dist. No. 458*, 172 P.3d 329, (Wash. 2007) (requiring disclosure of school security footage **and rejecting a view only restriction.**); *O’Connell v. Woodland Park Sch. Dist.*, 23CA0514, 2024 WL 4024491, (Colo. App. Feb. 1, 2024) (requiring disclosure of school security footage). **Across our country Courts have held generalized fears do not override the public’s right of access, especially where narrow tailoring and redaction can address legitimate concerns.**

¹ *Exhibit P3.*

Third, and most fatally, the Board’s own offer to show the footage in person concedes the premise of its argument is wrong. If viewing the footage does not jeopardize safety, the Board cannot claim that providing the same footage in electronic form suddenly becomes too dangerous. Courts recognize that this kind of “private viewing but no copy” position is a tell. In *Lindeman*, the Washington Supreme Court held that permitting a requester to view the video “further undermin[ing] the credibility of any later claim” that the same video was exempt, because if it were truly protected the agency would have recognized that immediately and would not have shared it absent proper legal authority. *Lindeman v. Kelso Sch. Dist. No. 458*, 172 P.3d 329, 332 (Wash. 2007). Because credibility and facts are clearly at issue, Plaintiff needs to cross examine the records custodian.

The Court should reject the Board’s “security” theory and order immediate production of the requested recording in electronic form, with narrowly tailored redactions if necessary.

BRIEF STATEMENT OF FACTS AND PROCEDURAL HISTORY

I. The Parties and the Request

Plaintiff Benjamin Shore is a journalist and the founder and chief editor of Shore Investigates, where he publishes fact-based reporting on transparency, government accountability, and community safety. In his capacity as a member of the news media, Mr. Shore sought access to a limited segment of security-camera footage depicting a public meeting of the Cherry Hill Township Board of Education.

On December 16, 2025, the Board held a public meeting, open to and attended by the public. During that meeting, the District presented the “Cherry Hill Tomorrow Project Update.” *Verified Compl.* ¶¶ 10–11. On January 9, 2026, Mr. Shore submitted an OPRA and common-law request that was narrow and time-limited. He requested only the footage covering that specific

presentation segment, with a reasonable buffer immediately before and after, totaling approximately five to ten minutes, and limited to any camera angle capturing the Board dais and or the public audience during that segment, including reactions. He requested the footage in electronic form. *Exhibit P1; Verified Compl.* ¶¶ 12–13.

Defendants refused to provide any electronic copy. Instead, the District offered only an in-person viewing at District offices under District-controlled conditions. The District asserted that releasing a copy would compromise security by revealing the “capabilities and vulnerabilities” of its system, including coverage levels, potential blind spots, image and resolution quality, whether cameras record in color or black and white, and whether audio is captured. *Exhibit P2; Verified Compl.* ¶¶ 14–15. Despite their legal duty, Defendants did not identify any specific OPRA exemption or legal authority as the basis for a categorical refusal to provide a copy. *Exhibit P2; Verified Compl.* ¶ 16.

Mr. Shore attempted to resolve the dispute without litigation. He proposed practical, narrowly tailored safeguards, including cropping the frame, lowering resolution, accepting black-and-white footage, and receiving video without audio. He also offered to pay a special service charge for any reasonable redactions. Defendants rejected those proposals, refused a controlled remote viewing, and maintained their position that they would not provide an electronic copy unless ordered by the Court. *Exhibit P2; Verified Compl.* ¶¶ 17–21.

Cherry Hill’s position is also an outlier in practice. Mr. Shore has obtained comparable Board-meeting security-camera footage from ten other New Jersey public school districts, and security-camera footage from a Cherry Hill Township meeting. *Exhibit P3; Verified Compl.* ¶¶ 22–23. Having been denied an electronic copy and any workable alternative, Plaintiff brings this

summary action seeking expedited relief compelling production in electronic form, subject only to reasonable, narrowly tailored redactions if the Court finds any portion lawfully exempt.

LEGAL STANDARD

I. The Open Public Records Act (OPRA)

The New Jersey Legislature, in enacting OPRA, established a clear public policy: “government records shall be readily accessible for inspection, copying, or examination by the citizens of this State.” N.J.S.A. 47:1A-1. The statute is built upon a fundamental presumption that “any limitations on the right of access... shall be construed in favor of the public's right of access.” *Id.*

II. Common Law Right of Access

Even where OPRA does not compel disclosure, New Jersey’s common law provides an independent, qualified right of access to public records. *See* N.J.S.A. 47:1A-8 (“Nothing contained in [OPRA] shall be construed as limiting the common law right of access to a government record, including criminal investigatory records of a law enforcement agency.”); *Rivera v. Union Cnty. Prosecutor's Office*, 250 N.J. 124, 143 (2022) (“OPRA does not limit the right of access to government records under the common law.”). In fact, “[t]he definition of a public record under the common law is broader than under OPRA.” *Id.*

To gain access under the common law, “(1) the person seeking access must establish an interest in the subject matter of the material; and (2) the citizen's right to access must be balanced against the State's interest in preventing disclosure.” *Gannett Satellite Info. Network, LLC v. Twp. of Neptune*, 254 N.J. 242, 257 (2023).

LEGAL ARGUMENTS

Government accountability depends on transparency, and transparency depends on the public's right to see what its elected officials do in public meetings. *Burnett v. County of Bergen*, 198 N.J. 408, 414 (2009) (Rabner, C.J.) (“[O]ur government works best when its activities are well-known to the public it serves.”).

I. OPRA ESTABLISHES A STRONG PRESUMPTION OF PUBLIC ACCESS, AND DEFENDANTS HAVE FAILED TO OVERCOME IT.

OPRA starts from a simple premise: “government records shall be readily accessible for inspection, copying, or examination by the citizens of this State.” N.J.S.A. 47:1A-1. The record at issue is a short, time-limited segment of security-camera footage capturing a public Board of Education meeting in a public auditorium. Plaintiff did not request “all footage,” or a sweeping download of the District’s security system. He requested a narrow clip tied to a specific date and a limited time period, precisely the kind of tailored request that OPRA contemplates when it addresses security footage. N.J.S.A. 47:1A-1.1 provides that “security alarm system activity and access reports, including video footage, for any public building, facility, or grounds” are excluded “unless the request identifies a specific incident that occurred, or a specific date and limited time period at a particular public building, facility, or grounds, and is deemed not to compromise the integrity of the security system by revealing capabilities and vulnerabilities of the system.” Plaintiff’s request does exactly that.

In *O’Connell v. Woodland Park School District*, a requester sought security-camera recordings connected to a school board meeting, and the district responded **the same way** Cherry Hill has here, by insisting that camera footage necessarily reveals “specialized details” of security.² The Colorado Court of Appeals rejected that move because it tries to convert a narrow exception

² *O’Connell v. Woodland Park Sch. Dist.*, 23CA0514, 2024 WL 4024491, at *2 (Colo. App. Feb. 1, 2024).

into a blanket rule. *Id.* The district argued it was “axiomatic” that “the capabilities, configurations, settings, and usage of security cameras” are exempt, but **the court held that theory would “essentially mean that, as a matter of law, all security camera footage is exempt,”** and it found “no authority” for a per se exemption. *Id.* at *4. That is the same policy problem Cherry Hill’s position creates under OPRA. If “capabilities and vulnerabilities” is enough to deny any copy of any footage, then the right of access becomes illusory.

Defendants’ denial also conflicts with the Appellate Division’s treatment of school security footage. In *Zeza v. Evesham Township Board of Education*, the Appellate Division rejected the notion that *Gilleran* created a blanket exemption for surveillance video and emphasized the government’s burden to prove that disclosure would reveal security-compromising information. *Zeza v. Evesham Twp. Bd. of Educ.*, A-0537-21, 2023 WL 4248732, (N.J. Super. Ct. App. Div. June 29, 2023) (unpublished). *Zeza* upheld disclosure of a limited, incident-specific clip where the board failed to support its fear-based claims with competent evidence and where the footage showed only a limited snapshot of the system. *Id.*

Plaintiff asked for minutes, not hours. Defendants responded with generalized talking points about “capabilities and vulnerabilities,” but refused every reasonable safeguard Plaintiff proposed, including cropping the frame, lowering resolution, producing black-and-white footage, removing audio, and paying a special service charge for redaction work. OPRA does not permit an agency to refuse to “move an inch” and then claim it had no choice. If Defendants believe a portion of the clip raises a legitimate security concern, OPRA’s answer is redaction and production of the remainder, not total non-disclosure. *See Rivera v. Union Cnty. Prosecutor's Office*, 250 N.J. 124, 135-136 (2022) (Rabner, C.J.) (trial courts should resolve confidentiality by reviewing the record in camera, making appropriate redactions, and disclosing what remains under the common-

law balancing test.); *Libertarians for Transparent Gov't v. Cumberland Cnty.*, 250 N.J. 46, 54 (2022) (Rabner, C.J.) (explaining that one way to strike the balance is targeted redactions and that, if part of a record is exempt, the custodian may redact that portion and must then “promptly permit access to the remainder of the record” (quoting *N.J.S.A.* 47:1A-5)).

Finally, Defendants’ position is unreasonable in practice. Plaintiff has already obtained the same type of record, security-camera footage of public board meetings, from ten other New Jersey public school districts. *Exhibit P3*. If the routine disclosure of short, meeting-related clips truly created the catastrophic risk Defendants now claim, those districts would not have produced it. Cherry Hill is the outlier. And more importantly, OPRA was “enacted ‘to maximize public knowledge about public affairs in order to ensure an informed citizenry and to minimize the evils inherent in a secluded process,’” *Simmons v. Mercado*, 247 N.J. 24, 38, 252 A.3d 995 (2021) (quoting *Mason v. City of Hoboken*, 196 N.J. 51, 64, 951 A.2d 1017 (2008)). The very purpose of OPRA is to **prevent** the kind of secrecy that Defendants now seek to impose.

The Court should not endorse an outlier policy that converts a narrow, public-interest request into a categorical rule of secrecy.

II. DEFENDANTS VIOLATED OPRA BY DENYING ACCESS WITHOUT PROPERLY INVOKING A SPECIFIC STATUTORY EXEMPTION AND BY FAILING TO COMPLY WITH OPRA’S REQUIRED DENIAL PROCEDURES.

OPRA requires transparency not only in outcomes, but in the denial itself. “If the custodian is unable to comply with a request for access, the custodian shall indicate the specific basis therefor on the request form and promptly return it to the requestor. The custodian shall sign and date the form and provide the requestor with a copy thereof.” N.J.S.A. 47:1A-5. That requirement matters because it forces precision. A custodian must identify an actual exemption and commit to it, not send shifting explanations and speculation.

Here, Defendants did not meet that basic obligation. They refused to provide an electronic copy, but did not lawfully anchor their denial to a specific statutory exemption through OPRA's required mechanism. That failure is not a technicality. It is the difference between a lawful OPRA denial and an improvised policy choice. And OPRA places the burden where it belongs: "The public agency shall have the burden of proving that the denial of access is authorized by law." N.J.S.A. 47:1A-6. A denial built on generalized fears, without a properly stated statutory basis and without competent evidence, cannot satisfy that burden.

III. DEFENDANTS VIOLATED THE COMMON-LAW RIGHT OF ACCESS BECAUSE THE BALANCE STRONGLY FAVORS DISCLOSURE OF A SHORT PUBLIC-MEETING CLIP, SUBJECT TO TAILORING.

Even if the Court concludes OPRA does not compel production, the common law does. Under New Jersey's common law, access turns on a three-step showing, the record must be a common-law public document, the requester must show a cognizable interest, and the court must balance that interest against the government's claim to confidentiality. *Keddie v. Rutgers, State Univ.*, 148 N.J. 36, 50 (1997) (three-part test). All three prongs are met here.

The balance favors disclosure here for straightforward reasons. This is footage of officials conducting public business in a public meeting, a setting where transparency interests are at their peak. Plaintiff's interest is concrete and legitimate: he is a journalist reporting on government accountability and the conduct of elected officials in a public forum. Defendants' confidentiality claim is speculative, and it collapses further because Defendants themselves offered an in-person viewing. Courts view that kind of position with skepticism because it undercuts the premise that the footage is truly too dangerous to disclose. *Lindeman v. Kelso Sch. Dist. No. 458*, 172 P.3d 329, (Wash. 2007) (noting that allowing viewing undermined the credibility of a later claim that the videotape was exempt).

CONCLUSION

For the reasons above, Plaintiff respectfully requests that the Court grant the following relief:

1. Declaring that Defendants' denial violates OPRA;
2. Declaring that Defendants' denial violates the Common Law right of access;
3. Ordering Defendants to produce the requested footage promptly in electronic form, subject only to reasonable, narrowly tailored redactions if the Court finds any portion lawfully exempt;
4. Awarding Plaintiff costs under Rule 4:42-8(a); see also *Mills v. Div. of State Police*, A-5356-18T2, 2020 WL 4431746, at *6 (N.J. Super. Ct. App. Div. Aug. 3, 2020).
5. Ordering Defendants to issue a legally sufficient OPRA response that identifies the specific exemption(s) and legal authority relied upon for any withholding or limitation on access.
6. Granting such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

By: /S/Benjamin Shore

Benjamin Shore

Dated: February 10, 2026

CERTIFICATE OF SERVICE

I, Benjamin Shore, hereby certify that on February 10, 2026, I caused a true and correct copy of the attached to be served as follows:

VIA ECOURTS FILING:

Motions Clerk
Camden County Superior Court
Civil Processing, Hall of Justice First Floor
101 South 5th Street
Camden, NJ 08103

VIA ECOURTS and EMAIL:

Honorable Judge Mikulski
Camden County Superior Court
101 South 5th Street, Floor 1
Camden, New Jersey 08103

VIA ECOURTS and EMAIL:

Christina M. Michelson, Esq.
Methfessel & Werbel, Esqs.
2025 Lincoln Highway, Suite 200
Edison, NJ 08817
Email: michelson@methwerb.com
Tel: (732) 248-4200
Attorney for Defendants Cherry Hill Public Schools and Jason Schimpf.

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

By: /S/Benjamin Shore

Dated: February 10, 2026



New Jersey Judiciary - Civil Practice Division

Civil Case Information Statement (Civil CIS)

Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed, or attorney's signature is not affixed.

For Use by Clerk's Office Only

Payment type <input type="checkbox"/> check <input type="checkbox"/> charge <input type="checkbox"/> cash	Charge/Check Number	Amount \$	Overpayment \$	Batch Number
Attorney/Pro Se Name Benjamin Shore		Telephone Number (856) 701-7919 ext.		County of Venue Camden
Firm Name (if applicable)			Docket Number (when available)	
Office Address - Street 20 Brace Rd Suite 325		City Cherry Hill	State NJ	Zip 08034
Document Type OPRA Action			Jury Demand <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Name of Party (e.g., John Doe, Plaintiff) Benjamin Shore, Plaintiff		Caption Benjamin Shore v. JASON SCHIMPF, in his official ca		
Case Type Number (See page 3 for listing)		802		
Are sexual abuse claims alleged?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Does this case involve claims related to COVID-19?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is this a professional malpractice case?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If "Yes," see N.J.S.A. 2A:53A-27 and applicable case law regarding your obligation to file an affidavit of merit.				
Related Cases Pending?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If "Yes," list docket numbers				
Do you anticipate adding any parties (arising out of same transaction or occurrence)?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Name of defendant's primary insurance company (if known)		<input type="checkbox"/> None <input checked="" type="checkbox"/> Unknown		

The Information Provided on This Form Cannot be Introduced into Evidence.

Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation

Do parties have a current, past or recurrent relationship? ☐ Yes ☒ No

If "Yes," is that relationship:

☐ Employer/Employee ☐ Friend/Neighbor ☐ Familial ☐ Business

☐ Other (explain) _____

Does the statute governing this case provide for payment of fees by the losing party? ☒ Yes ☐ No

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition.
Summary proceeding expedited



Do you or your client need any disability accommodations?
If yes, please identify the requested accommodation:

☐ Yes ☐ No

Will an interpreter be needed?
If yes, for what language?

☐ Yes ☐ No

I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

Attorney/Self-Represented Litigant Signature:

Benjamin Shore

Civil Case Information Statement (CIS)

Use for initial pleadings (not motions) under *Rule* 4:5-1

CASE TYPES

(Choose one and enter number of case type in appropriate space on page 1.)

Track I - 150 days discovery

- 151 Name Change
- 175 Forfeiture
- 302 Tenancy
- 399 Real Property (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 Book Account (debt collection matters only)
- 505 Other Insurance Claim (including declaratory judgment actions)
- 506 PIP Coverage
- 510 UM or UIM Claim (coverage issues only)
- 511 Action on Negotiable Instrument
- 512 Lemon Law
- 801 Summary Action
- 802 Open Public Records Act (summary action)
- 804 Election Law
- 805 Civil Commitment Expungement
- 999 Other (briefly describe nature of action)

Track II - 300 days discovery

- 305 Construction
- 509 Employment (other than Conscientious Employees Protection Act (CEPA) or Law Against Discrimination (LAD))
- 599 Contract/Commercial Transaction
- 603N Auto Negligence – Personal Injury (non-verbal threshold)
- 603Y Auto Negligence – Personal Injury (verbal threshold)
- 605 Personal Injury
- 610 Auto Negligence – Property Damage
- 621 UM or UIM Claim (includes bodily injury)
- 699 Tort – Other

Track III - 450 days discovery

- 005 Civil Rights
- 301 Condemnation
- 602 Assault and Battery
- 604 Medical Malpractice
- 606 Product Liability
- 607 Professional Malpractice
- 608 Toxic Tort
- 609 Defamation
- 616 Whistleblower / Conscientious Employee Protection Act (CEPA) Cases
- 617 Inverse Condemnation
- 618 Law Against Discrimination (LAD) Cases

Track IV - Active Case Management by Individual Judge / 450 days discovery

156 Environmental/Environmental Coverage Litigation
 303 Mt. Laurel
 508 Complex Commercial
 513 Complex Construction
 514 Insurance Fraud
 620 False Claims Act
 701 Actions in Lieu of Prerogative Writs
 816 Affordable Housing

Multicounty Litigation (Track IV)

282 Fosamax
 291 Pelvic Mesh/Gynecare
 292 Pelvic Mesh/Bard
 293 DePuy ASR Hip Implant Litigation
 296 Stryker Rejuvenate/ABG II Modular Hip Stem Components
 300 Talc-Based Body Powders
 601 Asbestos
 624 Stryker LFIT CoCr V40 Femoral Heads
 626 Abilify
 627 Physiomesh Flexible Composite Mesh
 628 Taxotere/Docetaxel
 629 Zostavax
 630 Proceed Mesh/Patch
 631 Proton-Pump Inhibitors
 633 Prolene Hernia System Mesh
 634 Allergan Biocell Textured Breast Implants
 635 Tassigna
 636 Strattice Hernia Mesh
 637 Singulair
 638 Elmiron
 639 Pinnacle Metal-on-Metal (MoM) Hip Implants
 640 Bard Implanted Port Catheter Products
 641 Sexual Abuse in Juvenile Detention Facilities Operated by the State of New Jersey
 642 Roundup Products
 643 GLP-1 Medications - Gastrointestinal Injuries
 644 GLP-1 Medications - NAION Vision Loss

If you believe this case requires a track other than that provided above, please indicate the reason on page 1, in the space under "Case Characteristics".

Select each applicable category:

☐ Putative Class Action ☐ Title 59 ☐ Consumer Fraud
☐ Medical Debt Claim

Exhibit P1

Jan. 9, 2026, OPRA Request to Cherry Hill Township Board of Education

Jan 9, 2026

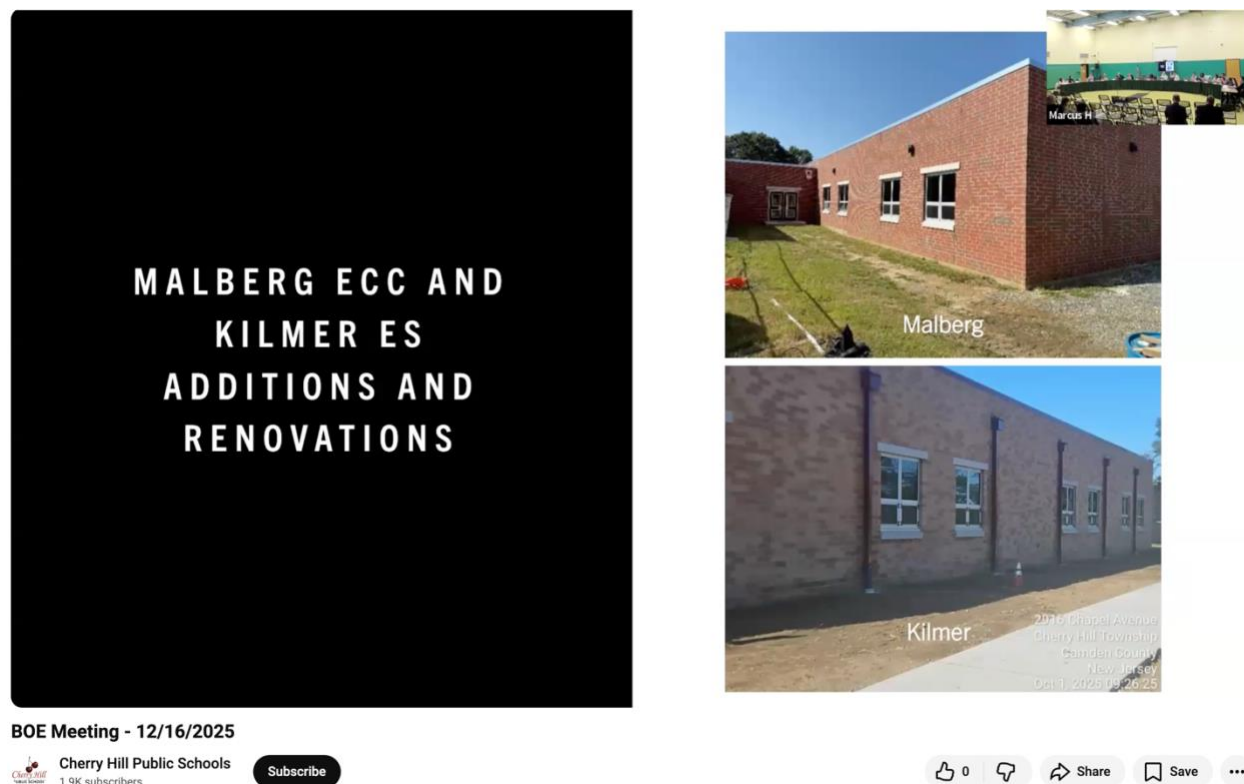
Dear Custodian of Records,

Pursuant to the New Jersey Open Public Records Act and right under the common law, I respectfully request the following Government Records:

(a) Security Camera Footage from the Cherry Hill Township Board of Ed ("The Board") meeting held on 12/16/25. I am seeking footage of the meeting during the "Cherry Hill Tomorrow Project Update" including a reasonable buffer immediately before and after the presentation to ensure the full segment is captured. This includes footage from any camera angle that captured the dais/Board members and/or the public audience during that segment (including reactions). For identification purposes only, during this presentation the District displayed visuals depicting school facilities and security-related design features, including exterior views showing doors, windows, and entry points, interior hallway and door views, vestibule features, and building floor plans illustrating classroom layouts and the location of doorways, windows, and entry and exit points. This request seeks only the meeting-room recording of the public board meeting.

I do note that 10 other public schools in NJ provided full unredacted security camera footage of their public Board of Education meeting.

Attached are images of screenshots from the publicly broadcasted board meeting which shows the presentation in which I am seeking footage from:



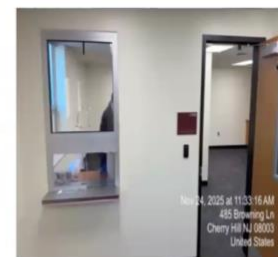
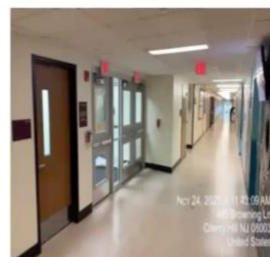
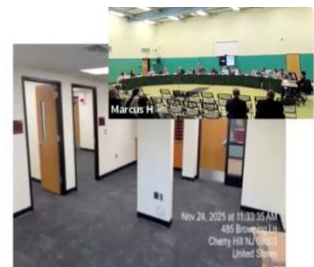
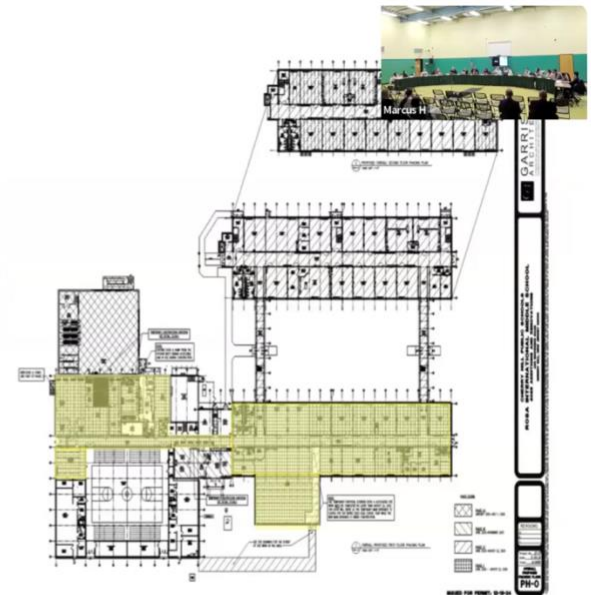
Jan. 9, 2026, OPRA Request to Cherry Hill Township Board of Education



BOE Meeting - 12/16/2025




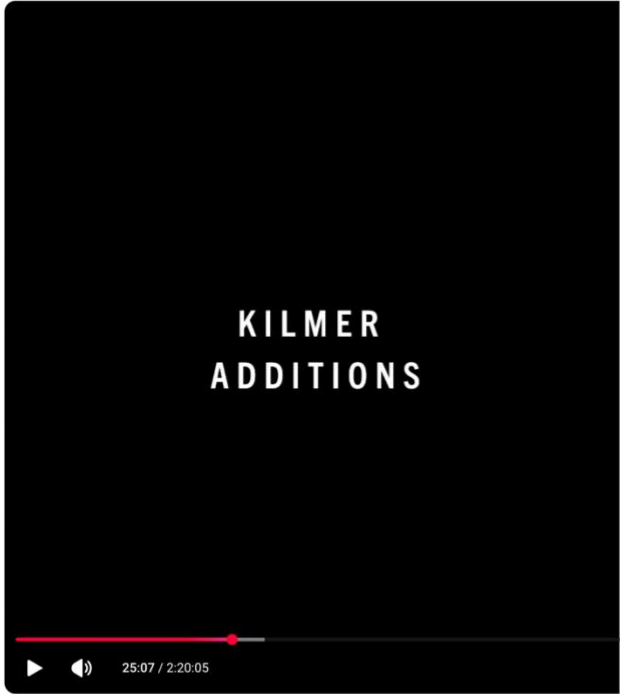


BOE Meeting - 12/16/2025



Jan. 9, 2026, OPRA Request to Cherry Hill Township Board of Education

KILMER ADDITIONS



25:07 / 2:20:05




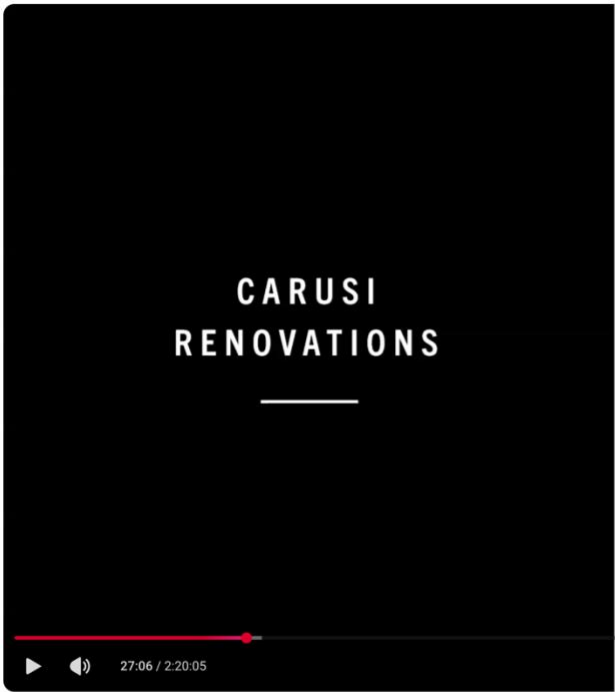
BOE Meeting - 12/16/2025

Cherry Hill Public Schools
1.9K subscribers

Subscribe

0 0 Share Save ...

CARUSI RENOVATIONS



27:06 / 2:20:05

BOE Meeting - 12/16/2025

Cherry Hill Public Schools
1.9K subscribers

Subscribe

0 0 Share Save ...

Jan. 9, 2026, OPRA Request to Cherry Hill Township Board of Education

Common Law Reason:

I assert a common law right of access to the requested records. This is for a News media request. I am the editor of ShoreInvestigates.com. We report on local news here in NJ. We use public records to make our journalism possible. The government should not operate in secrecy, and I am seeking a very limited clip of public officials during a public meeting that was open to the public and publicly attended.

Examples of my journalism can be found here:

1. <https://medium.com/@shoreinvestigates/the-man-in-the-red-acura-tesla-drivers-say-they-were-targeted-i-found-out-who-did-it-e64dec25ae19>
2. <https://medium.com/@shoreinvestigates/caught-on-bodycam-how-police-let-the-red-acura-driver-off-with-a-warning-watch-now-bca9ae58cb6e>

Redactions:

If any portion of this request is denied or redacted, please provide the specific exemption relied upon and cite the applicable provision of law, as required by law. *See also Libertarians for Transparent Gov't v. Cumberland Cnty.*, 250 N.J. 46, 54 (2022) (Rabner, C.J.) (explaining that if part of a record is exempt, the custodian may redact that portion and must then “promptly permit access to the remainder of the record” (quoting N.J.S.A. 47:1A-5)); *See also Rivera v. Union Cnty. Prosecutor’s Office*, 250 N.J. 124, 136 (2022) (recognizing common-law access with case-specific redactions); *See also States Newsroom Inc. v. City of Jersey City*, 261 N.J. 392, 413 (2025) (reinforcing a redact-then-release approach).

Certifications:

I certify I am not a felon. I am not seeking the records in conjunction with a legal proceeding. I am not seeking the request for commercial purposes.

Very respectfully,
Benjamin Shore
Chief Editor
Shore Investigates
<https://medium.com/@shoreinvestigates>



Ben Shore <shoreinvestigates@gmail.com>

OPRA and Common Law Request

Schimpf, Jason <jschimpf@chclc.org>
To: Ben Shore <shoreinvestigates@gmail.com>

Fri, Jan 23, 2026 at 12:01 PM

I appreciate your response below, but our position remains the same. You are more than welcome to view the video in a controlled environment here at the District offices. Please let me know if or when you would like to schedule.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools
(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Thursday, January 22, 2026 1:03 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Subject: Re: OPRA and Common Law Request

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

I am in Maryland, it requires two party consent. It would be a felony if I recorded. I am entering the practice of law, why would I commit a felony over a short couple minutes of footage?

Additionally, I'm a vetted person and I'm happy to provide you with confirmation from the United States Department of Justice criminal division of my top secret security clearance. I've worked in federal law-enforcement for three years prior to law school. My clearance expires in 2027.

I have absolutely no intention of committing a felony. I am sick, I am just requesting a reasonable accommodation to review it virtually. You maintain control, you maintain possession. I'm trying to be reasonable. There's simply no basis to believe that I'm going to commit a felony, none.

Please reconsider. Perhaps you were not aware of those facts. Additionally, I am willing to execute an agreement that I will not screen record that I will be legally bound to. I am engaging in the interactive process required under the LAD and offering multiple solutions here.

Ben

On Thu, Jan 22, 2026 at 12:33 PM Schimpf, Jason <jschimpf@chclc.org> wrote:

I'm denying your request due to the security concerns previously articulated. I have no control over your ability to record and distribute the zoom call, which would defeat the purpose of the original reason provided for denying an electronic copy of the video.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools

(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Thursday, January 22, 2026 12:25 PM
To: Schimpf, Jason <jschimpf@chclc.org>

Subject: Re: OPRA and Common Law Request

CAUTION: [EXTERNAL EMAIL]

Hi Mr. Schimpf,

Just to confirm, you are also denying my request for a reasonable accommodation under the NJLAD?

Ben

On Thu, Jan 22, 2026 at 12:11 PM Schimpf, Jason <jschimpf@chclc.org> wrote:

Ben,

I hope you feel better soon. Once you are well enough, you will be welcome to travel the hours necessary to conduct an in person viewing, which we respectfully decline to provide remotely because of the security reasons previously articulated.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools
(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Thursday, January 22, 2026 11:55 AM
To: Schimpf, Jason <jschimpf@chclc.org>

Subject: Re: OPRA and Common Law Request

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

Does today or tomorrow work for you? I remain available to view. I think we're supposed to proceed as expeditiously as possible under OPRA.

Ben

On Wed, Jan 21, 2026 at 1:42 PM Ben Shore <shoreinvestigates@gmail.com> wrote:

Mr. Schimpf, I've thought further about your offer of an in-person viewing. While any limitation on the right of access should be construed in favor of public access, I am trying to be reasonable and find middle ground, and I am willing to proceed with a controlled private viewing as a compromise for this request.

Because I am not currently in New Jersey and traveling to the District offices would take hours, would the District meet me halfway and provide that same controlled viewing virtually, so the

District's stated security concerns are addressed while public access is still meaningfully provided?

In the alternative, please treat this request for virtual viewing as a request for a reasonable accommodation under the NJLAD. I currently have the flu and cannot safely travel at this time, and I am unsure when I will be fully recovered as I am immunosuppressed.

Thanks,
Ben

On Wed, Jan 14, 2026 at 5:12 PM Ben Shore <shoreinvestigates@gmail.com> wrote:
Mr. Schimpf,

I hear you and I apologize if you interpreted anything as indicating bad faith. My intent is that I feel that there could be solutions to resolve this problem. I have identified reasonable solutions to every concern you raised, I have offered to pay a special service charge, I have offered to even perform the redactions myself under contract that it will not be released otherwise.

We can let the Court decide this one.

Respectfully,
Ben

On Wed, Jan 14, 2026 at 4:43 PM Schimpf, Jason <jschimpf@chclc.org> wrote:
My apologies. Dr. Shore.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools
(856) 429-5600 x4328

From: Schimpf, Jason <jschimpf@chclc.org>
Sent: Wednesday, January 14, 2026 4:42 PM
To: Ben Shore <shoreinvestigates@gmail.com>

Cc: Eric Harrison <harrison@methwerb.com>; Christina Michelson <michelson@methwerb.com>; Paul H. Green <PHG@spsk.com>; Katherine A. Gilfillan <kag@spsk.com>
Subject: Re: OPRA and Common Law Request

Mr. Shore,

I have done nothing but work with you since I arrived in Cherry Hill. We can disagree on the interpretation of statute, but please do not accuse me of working in bad faith. I have made every attempt to satisfy your, and all other, requests to the best of my ability while also protecting the integrity of the process. Your requests consume an extraordinary amount of time and effort, and I have done nothing but continue to take your requests seriously and provide respectful responses. I ask that you provide the same level of respect.

You have my answer. I'm sorry you disagree.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools

(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Wednesday, January 14, 2026 4:34 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Eric Harrison <harrison@methwerb.com>; Christina Michelson <michelson@methwerb.com>; Paul H. Green <PHG@spsk.com>; Katherine A. Gilfillan <kag@spsk.com>
Subject: Re: OPRA and Common Law Request

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

I confirm receipt of your email. OPRA is supposed to be a collaborative process and it doesn't feel like there is much collaboration when you won't compromise or even explore other solutions to balance the security interests with the public's right to know.

Please preserve the footage for anticipated litigation.

Thank you,
Ben

On Wed, Jan 14, 2026 at 4:22 PM Schimpf, Jason <jschimpf@chclc.org> wrote:
I continue to uphold my denial based on the reasons previously provided.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools
(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Wednesday, January 14, 2026 3:14 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Eric Harrison <harrison@methwerb.com>; Christina Michelson <michelson@methwerb.com>; Paul H. Green <PHG@spsk.com>; Katherine A. Gilfillan <kag@spsk.com>
Subject: Re: OPRA and Common Law Request

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

Thank you for your email. As I stated, I am flexible and I am willing to work with your concerns. You advised that "[t]he footage would reveal sensitive information such as coverage levels, potential blind spots, image and resolution quality, whether cameras record in color or black and white, and whether audio is captured."

I have a proposal that I think can address each concern:

1. Coverage levels/blind spots – Crop the video frame so I do not know the full extent of what the camera covers or what blind spots may exist.
2. Image and resolution quality – I am willing to accept a “redacted” version with some pixelation to reduce the quality, so it is impossible to know the true resolution. For example, you could export the file as a 480p instead of HD or whatever it is, no need to tell me.
3. I am willing to compromise and receive the footage in black and white, so It be would impossible to tell if it is available in color.
4. Audio capture – I am willing to compromise and accept just the video, do not provide audio, therefore it is impossible to tell if audio is captured.

Independent of these solutions, in theory, I could see the full video in person, make note of the image and resolution quality, make note of whether or not what I saw was black-and-white or in color, and make note of whether or not I heard audio. Offering an in person viewing would expose me to all the security risk you list. I would argue that my proposed compromise does a better job at protecting the integrity than giving away all the cards and letting me see in-person.

I hope you agree that my proposed compromise addresses each risk the district lists.

Would you agree?

Ben

On Wed, Jan 14, 2026 at 2:49 PM Schimpf, Jason <jschimpf@chclc.org> wrote:

Mr. Shore,

We have addressed your objections on multiple occasions, and our position has not changed. The district's determination regarding the release of security camera footage remains the same. While you are welcome to view the video in person, we will not provide an electronic copy. Our responsibility is to protect the integrity of the district's security system, including its capabilities and vulnerabilities. There is a significant difference between allowing you to view the footage under controlled conditions and releasing an electronic copy that could be posted publicly and shared without limitation.

The footage would reveal sensitive information such as coverage levels, potential blind spots, image and resolution quality, whether cameras record in color or black and white, and whether audio is captured. Even assuming your intentions are not improper, once the footage is released, we cannot control how others may use or disseminate it.

For these reasons, and consistent with established legal guidance regarding security-related records, the district must maintain its position unless ordered otherwise by a court of law.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools
(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Wednesday, January 14, 2026 2:27 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Eric Harrison <harrison@methwerb.com>; Christina Michelson <michelson@methwerb.com>; Paul H. Green <PHG@spsk.com>; Katherine A. Gilfillan <kag@spsk.com>
Subject: Re: OPRA and Common Law Request

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

I respectfully object to this denial. I am only asking for a couple minutes of footage from a public board meeting that was open to the public. It is unclear how releasing the footage would compromise the integrity and vulnerabilities of the system when you are simultaneously offering to show it to me. Wouldn't that then disclose the security vulnerabilities? The only difference is whether or not I get access to a copy of it. The security concerns I imagine would remain either way.

I hope you will reconsider this denial.

I am flexible and if we can redact portions to cover parts of what the camera can see so I only get a portion I am also open to that.

Ben

On Wed, Jan 14, 2026 at 2:00 PM Schimpf, Jason <jschimpf@chclc.org> wrote:

Mr. Shore,

In response to your OPRA and common law requests, we have determined that releasing the requested security video footage would compromise the integrity of the District's security system by revealing its capabilities and vulnerabilities. While we cannot agree to release the video, we can offer you the opportunity to view the footage in person at the District offices. Please let me know if and when you would be interested in viewing the footage.

Jason Schimpf
Assistant Superintendent/Business Administrator/Board Secretary
Cherry Hill Public Schools
(856) 429-5600 x4328

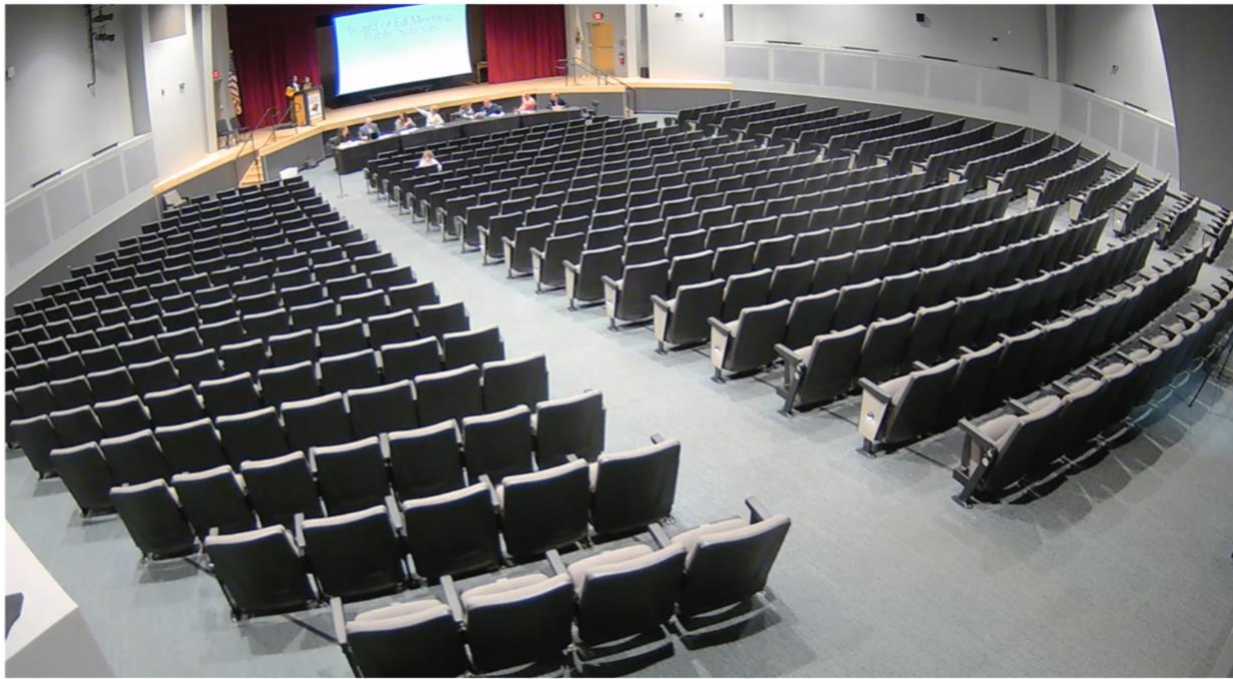
From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Friday, January 9, 2026 4:05 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Eric Harrison <harrison@methwerb.com>; Christina Michelson <michelson@methwerb.com>; Paul H. Green <PHG@spsk.com>; Katherine A. Gilfillan <kag@spsk.com>
Subject: OPRA and Common Law Request

CAUTION: [EXTERNAL EMAIL]

Good afternoon Mr. Schimpf,

Please see the attached OPRA and Common Law Request.

Thank you,
Ben Shore



Surveillance-camera footage from the Cedar Grove Township School District Board of Education meeting, October 14, 2025



Surveillance-camera footage from the Dennis Township School District Board of Education meeting, September 25, 2025



Surveillance-camera footage from the Downe Township School District Board of Education meeting, October 21, 2025



Surveillance-camera footage from the Fairfield Township School Board of Education meeting, October 9, 2025



Surveillance-camera footage from the Gloucester City Public School District Board of Education meeting, October 7, 2025



Surveillance-camera footage from the Haddon Heights Board of Education meeting, October 14, 2025



Surveillance-camera footage from the North Caldwell School District Board of Education meeting, October 14, 2025



Surveillance-camera footage from the Upper Township School District Board of Education meeting, September 22, 2025



Surveillance-camera footage from the Woodbine School District Board of Education meeting, September 15, 2025



Security Surveillance-camera footage from the Cherry Hill Township meeting, June 13, 2025



Surveillance-camera footage from the Wildwood City School District Board of Education meeting, October 15, 2025

