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April 30, 2026

VIA ECOURTS FILING

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

RE: **CHERRY HILL TOWNSHIP BOE VS. SHORE INVESTIGATES, Please reply to New Jersey
ET AL.**

Our File No. : 97628 ELH
Docket No. : CAM-L-620-26

Dear Sir/Madam:

Enclosed please find the following documents:

- ☒ Opposition to the Order to Show Cause
- ☒ Certifications
- ☒ Exhibits
- ☒ Certificate of Mailing

Very truly yours,

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Camden County Superior Court

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CHERRY HILL TOWNSHIP BOARD OF
EDUCATION,

Plaintiff,

V.

SHORE INVESTIGATES, LLC, DANIEL
SHORE, AND BENJAMIN SHORE,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: CAMDEN COUNTY
DOCKET NO.: CAM-L-620-26

Civil Action

**CERTIFICATION OF BRENT R.
POHLMAN, ESQ.**

I, Brent R. Pohlman, of full age, duly certify as follows:

1. I am an attorney at law in the State of New Jersey, associated with the law firm of Methfessel & Werbel, attorneys for the defendant(s), Cherry Hill School District, and in such capacity I am fully familiar with the facts of the within matter.

2. Annexed hereto is a true and accurate copy of the Verified Complaint filed by the Cherry Hill Board of Education dated February 20, 2026 as **Exhibit A**.

3. Annexed hereto is a true and accurate copy of a Facebook Post made to Cherry Hill ACTS Facebook page as **Exhibit B**.

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.

METHFESSEL & WERBEL, ESQS.
Attorneys for Cherry Hill Township
Board of Education

By: _____
Brent R. Pohlman

DATED: April 30, 2026

CHERRY HILL TOWNSHIP BOARD OF
EDUCATION

Plaintiff

V.

SHORE INVESTIGATES, LLC, DANIEL
SHORE, AND BENJAMIN SHORE,

Defendants

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: CAMDEN COUNTY
DOCKET NO.: CAM-L-620-26

Civil Action

**CHERRY HILL TOWNSHIP BOARD OF EDUCATION'S OPPOSITION TO
THE DEFENDANTS' ORDER TO SHOW CAUSE**

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PRELIMINARY STATEMENT

The instant Order To Show Cause is an attempt by the Shore Defendants to have this Court determine that the 2024 amendments to the New Jersey Open Public Records Act (“OPRA”) are usurped and rendered unenforceable by the New Jersey Legislature’s 2023 enactment of the Uniformed Public Expression Protection Act (“UPEPA”). This effort by the Shore Defendants lacks any legal merit and is essentially grasping at straws to avoid the Legislature’s clear intent of the 2024 OPRA amendments.

On September 7, 2023, New Jersey adopted the UPEPA which provides an expedited process for dismissal of a lawsuit that arises from; (i) communication in a legislative, executive, judicial, administrative, or other governmental proceeding; (ii) communication on an issue under consideration or review in a legislative, executive, judicial, administrative, or other governmental proceeding; or (iii) exercise of the right of freedom of speech or of the press, the right to assembly or petition, or the right of association, guaranteed by the United State Constitution or the New Jersey Constitution, on a matter of public concern. Thereafter on September 3, 2024, the New Jersey Legislature’s amendments to OPRA became effective. Included in the 2024 OPRA amendments was a new provision that specifically authorized public entities to file an Order To Show Cause when a requestor’s OPRA filing is being used to seek records in a way that the public entity believes is intended to substantially interrupt the performance of a government function. The public entity can seek to have the Court limit

the scope and number of records requests that individuals can file or limit the public entities future obligations to be responsive to such requests.

The Shore Defendants would have this Court rule that a public entity's utilization of the legislatively enacted Order To Show Cause relief against a harassing requestor is a per se violation of UPEPA. However, clearly this is an invalid legal theory because the plain language of the UPEPA indicates that it does not protect harassing OPRA requestors, second, the 2024 OPRA amendments were enacted following the adoption of UPEPA in 2023, and finally the New Jersey legislature intended for the 2024 OPRA amendments to be effective in a world where UPEPA exists.

The Cherry Hill Board of Education's ("Board") Verified Complaint, sought a protective order against prolific requestors from substantially interrupting the performance of the Board under the guise of the Open Public Records Act ("OPRA") pursuant to N.J.S.A. § 47:1A-5.1. The Defendant Benjamin Shore has created chaos at the Board, impacting on its ability to service its constituents, its students, in a veiled claim for transparency. While his claim for transparency is under OPRA, which is legislation for transparent government, his real motive is to stymie the Board's ability to conduct business while masking his actions under the false veil of journalism- when it suits him.

Benjamin Shore's OPRA requests filed by himself, Daniel Shore, or through Shore Investigates, LLC (his own company) all seek the same end: to substantially interrupt the Board. Benjamin Shore has filed duplicative

OPRA requests and verified complaints, seeking the same OPRA document or surveillance video, as a pro se and with counsel, hoping to get a different result with a different judge.

Similarly, Benjamin Shore's website is another tool in his arsenal to substantially interrupt the Board from conducting business, mislead the public, and disrupt the orderly and efficient operation of the Board, as he is deceitfully and improperly masking himself as the Board. Benjamin Shore's website, "The Cherry Hill Public Schools OPRA Request Portal" ("The Website")- www.chpsopra.com, is almost identical to the Board's website. There are no clear indicators that the website is not run by the Board. The name of the Website does not differentiate itself in any way from the Board. Once you open the Website, the colors on the Website are strikingly similar to the Board's official colors, red and white. The Board has received over 20 OPRA requests through the Website by third-party requestors who believe it is run by the Board. There is no doubt that it has caused confusion within the district and will likely lead to legitimate OPRA requests being delayed due to Shore's deception.

The Defendants, Benjamin Shore, Daniel Shore, and Shore Investigates, LLC, seek relief under the Uniform Public Expression Protection Act ("UPEPA"), an anti-SLAPP law, claiming that the Board is attempting to punish the Defendants for their protected First Amendment activity. The Board's Verified Complaint does not impact on the Defendants'

First Amendment rights as it only seeks to limit OPRA requests for a short period and to make changes to the Website to stop confusion for the public.

The first step of the UPEPA analysis requires the Court to determine if the claims are based on protected speech and/or activity. The simple filing of OPRA requests and lawsuits does not satisfy this prong on its face. The Legislature clearly created N.J.S.A. §47:1A-5.1 to protect public entities from OPRA requests that “substantially interfere” with conducting business. The Defendants are essentially claiming that every OPRA request filed in the State would satisfy this prong, which was not contemplated by the Legislature. The Board is not seeking to stop any of the Defendants from exercising their freedom of speech, from publishing their thoughts and ideas, or appearing at a public meeting to speak before a governing body.

The protective order does not seek to stop any of the Defendants from creating a different website to discuss OPRA matters; it simply requests that the Website not resemble the Board’s website. In fact, Benjamin Shore admitted that he is seeking to procure work with the Board by use of his website, which is inappropriate and against the law. Further, the Board is not seeking to prohibit the Defendants from exercising speech at Board meetings or on any website. The Board seeks a protective order in order for the Board to focus on conducting board business and not responding to the Defendants’ repetitive and time consuming OPRA requests and numerous emails about them.

The second step of UPEPA evaluates the sufficiency of the complaint, which is satisfied in this matter. Count One of the Verified Complaint seeks a protective order under N.J.S.A. §47:1A-5.1 to preclude all three Defendants from filing an OPRA request with the Board for one year. Benjamin Shore, the main requestor, has used his brother, Daniel, and his company, Shore Investigates, LLC to file OPRA requests on his own behalf. Thus, rather than dealing with just one requester for duplicative documents, the Board has dealt with three. N.J.S.A. §47:1A-5.1 provides that “clear and convincing evidence” must be found in order for the issuance of a protective order; the Board, through discovery, will be able to meet its burden.

Similarly, Board has sufficiently plead for relief under Count Two of the Verified Complaint. The Defendants’ website is almost identical to the Board’s website and is actually called, “The Cherry Hill Public Schools OPRA Request Portal” (“The Website”)- www.chpsopra.com. It clearly has an appearance of the Board and solicits business on behalf of the Board. The website has caused great confusion to the public.

For the reasons set forth more fully below, the Defendants’ Order to Show Cause should be denied, and this matter should be adjudicated pursuant to N.J.S.A. §47:1A-5.1.

STATEMENT OF FACTS

1. DEFENDANTS' NUMEROUS AND HARASSING OPRA REQUESTS

The Board is a governing body that is charged with the supervision of the public schools in the Township of Cherry Hill pursuant to N.J.S.A. §18A:1-1, et seq. (See ¶1 of the Verified Complaint annexed to Certification of Eric Harrison, Esq. as **Exhibit A**). Defendant Benjamin Shore is the owner and founder of Defendant Shore Investigates, LLC. (See ¶3 Benjamin Shore Certification; ¶3-4 of the Verified Complaint annexed to Cert. Harrison as Exhibit A). Defendant Daniel Shore is the brother of Benjamin Shore and filed an OPRA request on behalf of Shore Investigates, LLC. (See ¶5 of the Verified Complaint annexed to Cert. Harrison as Exhibit A).

Over the past year and a half, the Defendants have submitted approximately 19 OPRA requests. (See Verified Complaint of Cert. Harrison as **Exhibit A**; see also ¶9-13 Certification of Jason Schimpf). Many of the OPRA requests seeking duplicative types of records. The Defendants have created a pattern of harassing the Board with their duplicative and vexatious OPRA requests. Benjamin Shore and Daniel Shore filed a total of 3 separate OPRA requests requesting the same documents- Third-Party OPRA requests filed with the District. (See ¶12, 28, and 31 of the Verified Complaint, **Exhibit A**). Benjamin Shore has submitted 5 separate requests for surveillance videos at board meetings. (See ¶17, 23, 36, 37, and 39 of the Verified Complaint, **Exhibit A**). Benjamin Shore has also submitted 6 separate requests for legal invoices concerning his litigated matters. (See ¶

24, 26, 30, 32, 33, and 35 of the Verified Complaint, **Exhibit A**). Benjamin Shore has also filed ORPA requests for information and emails. (See ¶17, 20 of the Verified Complaint, **Exhibit A**; see also ¶9-13 Certification of Jason Schimpf, **Exhibits A-E**).

Upon receipt of legal and valid responses and/or denials by the Board, Benjamin Shore has continued to request unredacted documents without a valid, legal basis, even though the Board's response was already upheld by the Court. (See ¶45 of the Verified Complaint, **Exhibit A**). The Defendants' numerous, repeated, and vexatious OPRA requests have required the Custodian to expend over one hundred hours of District staff time in reviewing and redacting records as well as answering their requests. (See ¶47 of the Verified Complaint, **Exhibit A**; see also ¶5 Certification of Jason Schimpf). To put that in context an average full-time employee works 2080 hours per year, as such these Defendants have taken approximate five percent (5%) of the Custodian's work hours just to prepare responses to their repetitive requests.

Not only has Benjamin Shore filed numerous OPRA requests, but he has also bombarded the Board with electronic correspondence. (See ¶6 Certification of Jason Schimpf). He has submitted over 260 emails to district staff and administrators over the year and a half. (See ¶7 Certification of Jason Schimpf). The Defendants' OPRA requests and electronic communications have substantially interrupted the performance of the district's operations and required the district to focus on responding

to them, rather than focusing of district business. (See ¶48 of the Verified Complaint, **Exhibit A**).

In addition, Benjamin Shore has filed three separate Verified Complaints, and Shore Investigates, LLC has filed one Verified Complaint for records sought. (See ¶14, 19, and 39 of Verified Complaint, **Exhibit A**). There are also two separate appeals pending before the Appellate Division. Ibid.

2. DEFENDANT BENJAMIN SHORE’S WEBSITE THAT MIMICS THE BOARD’S WEBSITE

In or around October 2025, it became known to the Board that Plaintiff had created a website entitled, “Cherry Hill Public Schools OPRA Request Portal.” (See ¶50 of Verified Complaint, **Exhibit A**). The Board’s website address is <https://www.chclc.org/departments/public-information> and provides a portal for members of the public to submit an OPRA request. (See ¶51 of Verified Complaint, **Exhibit A**). The Defendant’s website is strikingly similar to the Board’s website for OPRA requests as it has a similar banner at the top of the page and states that it is the OPRA portal for the “Cherry Hill Public School.” Ibid. It also utilizes a similar font to the Board’s website and otherwise appears to be affiliated with the District. (See ¶52 of Verified Complaint, **Exhibit A**). The Website contains no disclaimer to indicate that it is not affiliated with the Cherry Hill Public School District. (See ¶53 of Verified Complaint, **Exhibit A**). Shore’s Website has caused confusion with members of the public believing that his website was the Board’s official website through which official OPRA requests to the

District are submitted. (See ¶54 of Verified Complaint, **Exhibit A**). The Board has received approximately 25 OPRA requests through the Website. (See ¶14 Certification of Jason Schimpf). The Website has caused confusion as the public believes it is associated with the Board. (See ¶8 Certification of Jason Schimpf). Benjamin Shore also advertises his website on local Facebook pages concerning Board activity. (See **Exhibit B** of Cert. Harrison).

Despite numerous requests from the Board to deactivate the website, it remains active. (See ¶22 of Certification of Benjamin Shore). The Board has no ability to control the website or how the OPRA requests are processed in light of the strict time deadlines. (See ¶65-66 of Verified Complaint, **Exhibit A**). The public unknowingly waives their confidentiality when they submit OPRA requests through the Website without their knowledge that it is no associated with the Board. Ibid.

Further, the Website improperly advertises for attorneys, including C.J. Griffen, Esq., to file appeals of OPRA responses directly from the Website in the requestor's receipt email, giving the impression of the Board's endorsement of these attorneys. (See ¶67 of Verified Complaint, **Exhibit A**). Rather than deactivate his website or remove any reference of the Board, he improperly sought to conduct business with the Board through another website "OPRApro.com." (See ¶64 of Verified Complaint, **Exhibit A**). It is clear that Benjamin Shore's real motive is to conduct business with the Board through the creation of his websites.

LEGAL ARGUMENT

I. DEFENDANTS' ACTION AND/OR SPEECH IN QUESTION IS NOT PROTECTED UNDER THE NEW JERSEY ANTI-SLAPP STATUTE.

The Board filed its Verified Complaint for a protective order under the revised OPRA statute based upon Defendants' intent to substantially impair and interrupt the governmental function of the Board through their coordinated and targeted campaign of OPRA requests, litigation, and "Board OPRA" like website creation. The Defendants are attempting to conflate the Board's action for a protective order under OPRA with its own Order to Show Cause under the anti-SLAPP legislation to make it appear that the Board's suit centers on a dispute involving the suppression of protected speech or petitioning activity. However, the Defendants' arguments are nothing more than a red herring to misdirect the Court's focus as to the factual basis of the Defendants' underlying activity, which is to weaponize OPRA for abusive conduct and to burden the operations of government.

a. N.J.S.A. §47:1A-5.1 Allows the Board to Seek a Protective Order to Limit Harassing OPRA Requestors that Burden the Operations of Government

The Board's Verified Complaint does not penalize, limit, or quell the Defendants' speech. The Board is merely seeking relief under N.J.S.A. §47:1A-5.1 for a protective order from a pattern of abuse established by the Defendants' OPRA request. The Board is simply seeking the relief as articulated in the OPRA law itself, and not for the purpose of curtailing the

Defendants' speech or squelching criticism. This distinction is fundamental when evaluating the Board's Verified Complaint for a protective order.

The Defendants are asserting that the Board is trying to prevent the dissemination of information, regulating content, or the viewpoint of protected speech, but that is simply not the case. The Board is seeking relief from the Court via a protective order to safeguard itself from Defendants' abusive requests that have and will continue to interrupt the daily function of the Cherry Hill School District. In fact, the plain language of the OPRA statute requires the Board to prove its case by clear and convincing evidence, demonstrating that the Legislature's intent was to protect governmental entities from contemplated abusive request patterns and provided governmental agencies with a remedy.

If this Court were to adopt the Defendants' interpretation of said legislation, it would render the OPRA safeguards in N.J.S.A. §47:1A-5.1 ineffective and meaningless. Therefore, the plain language of the OPRA statute itself illustrates the legislative intent behind said legislation, which is to allow/permit a governmental agency/entity to seek a protective order against abusive request patterns, while balancing and protecting legitimate public requests for information. The revised OPRA statute does not prohibit speech altogether, but rather addresses the operational consequences of a pattern of requests that are designed to disrupt governmental function without legitimate concern and/or purpose.

On June 5, 2024, Governor Phil Murphy enacted significant OPRA reform legislation. The new amendments became effective September 3, 2024, and included N.J.S.A. 47:1A-5.1. N.J.S.A. 47:1A-5.1(a-b) provides as follows:

a. Notwithstanding any other law or rule or regulation to the contrary, whenever there is filed a verified complaint to the Superior Court of the county in which the request for access to government records was made under P.L. 1963, c.73 (C.47:1A-1 et seq.) **alleging that a requestor has sought access to government records with the intent to substantially interrupt the performance of government function, the court may issue a protective order limiting the number and scope of requests the requestor may make** or order such other relief as it deems appropriate, including referral of the matter to mediation or a waiver of the required response time. **The court may issue the protective order if it finds by clear and convincing evidence that the requestor has sought records under P.L. 1963, c.73 (C.47:1A-1 et seq.) with the intent to substantially interrupt the performance of government function.** The complaint shall be accompanied by a declaration of facts by the public agency withholding the records demonstrating that it has complied with P.L. 1963, c.73, (C.47:1A-1 et seq.) and has made a good faith effort to reach an informal resolution of the issues relating to the records requests.

The requestor shall have notice and an opportunity to answer the allegations set forth in the petition submitted by the public agency.

The public agency shall have the burden of proof by clear and convincing evidence.

The court's consideration of a public agency's complaint for relief shall proceed in a summary or expediated manner.

b. The order specified in subsection a. of this section may limit, or, in appropriate circumstances, eliminate the public agency's duty to respond to government records requests from the requestor in the future.

Emphasis added. In other words, the statute allows Courts to issue protective orders limiting individuals who have submitted OTPA requests "with intent to substantially interrupt the performance of government function." Ibid.

Prior to filing a verified complaint for a protective order, the government agency must demonstrate that the request for access to a government record would substantially disrupt the agency's operations. Ibid. If so, then the custodian may deny access to the record(s) only after attempting to reach a reasonable solution with the requestor that accommodates the interests of the requestor and the agency. See N.J.S.A. 47:1A-5(g). This is a subjective determination based on the circumstances and resources available to fulfill said request. In Caggiano v. N.J. Div. of Consumer Affairs, GRC 2007-69, the Council ruled that the agency acted reasonably in trying to accommodate the requestor and properly met its burden of proving a substantial disruption of operations. Conversely, in Caldwell v. Vineland Bd. Of Educ. (Cumberland), GRC 2009-278, the Council held that the custodian violated OPRA by denying access under the exemption without trying to reach a reasonable accommodation.

b. OPRA section N.J.S.A. §47:1A-5.1 establishes that some OPRA requests are improper when made with a disruptive intent

OPRA Statute N.J.S.A. §47:1A-5.1 is a conduct-regulating statute that necessarily contemplates the possibility of abusive OPRA requests, thus, a mechanism for a protective order. Accordingly, the statute and Legislature's intent would be rendered meaningless if every OPRA request, regardless of intent or effect, were categorically protected as a petitioning activity under UPEPA.

This Court's objective in statutory construction "is to effectuate legislative intent," and "[t]he best source for direction on legislative intent is the very language used by the Legislature." *Gilleran v. Township of Bloomfield*, 227 N.J. 159, 171-72 (2016). The words in a statute are to "be given their generally accepted meaning" and "read and construed with their context." See *Bozzi v. City of Jersey City*, 248 N.J. 274 (2021) citing N.J.S.A. §1:1-1. "If the language is clear, the court's job is complete." *In re Expungement Application of D.J.B.*, 216 N.J. 433, 440 (2014).

Here, the Court must review the plain language of the statute itself, which recognizes that access to governmental records is not absolute. The statute permits a governmental entity to seek a protective order if the request would substantially disrupt an agency's operation. The Legislature enacted this statute recognizing that the manner and volume of requests can create legitimate operational concerns that would interrupt the function of government. In accordance with N.J.S.A. §47:1A-5.1, the Board properly

sought relief provided therein, and the Court should evaluate the Verified Complaint on its merits. Therefore, the Defendants' Order to Show Cause should be denied.

II. THE OTSC SHOULD BE DENIED BECAUSE THE DEFENDANTS DO NOT SATISFY THE TWO STEPS OF THE UPEPA

UPEPA applies to, among other matters, "a cause of action asserted in a civil action against a person based on the person's . . . exercise of freedom of speech . . . on a matter of public concern," commonly referred to as strategic lawsuits against public participation. N.J.S.A. §2A:53A-50(b). The UPEPA statute is multi-pronged. Under N.J.S.A. §2A:53A-51, when a pleading asserts a cause of action to which the statute applies, a party must file an application for an order to show cause to dismiss the cause of action or parts of the cause of action within 60 days after being served.

The statute requires that the order to show cause be heard expeditiously and to the extent that discovery is required, that the court hear the order to show cause as soon as practicable after the conclusion of time set forth in its order permitting limited discovery. N.J.S.A. §2A:53A-53. "In ruling on an order to show cause under section 3 of P.L.2023, c. 155 (C.2A:53A-51), the court may consider the pleadings, the order to show cause application and supporting certifications, briefs, any reply or response to the order to show cause, and any evidence that could be

considered in ruling on a motion for summary judgment.” N.J.S.A. §2A:53A-54.

Dismissal of a cause of action under the statute requires a finding of the following:

a. In ruling on an order to show cause under section 3 of P.L.2023, c. 155 (C.2A:53A-51), the court shall dismiss with prejudice a cause of action, or part of a cause of action, if: (1) the moving party establishes under subsection b. of section 2 of P.L.2023, c. 155 (C.2A:53A-50) that this act applies; (2) the responding party fails to establish under subsection c. of section 2 of P.L.2023, c. 155 (C.2A:53A-50) that this act does not apply; and (3) either: (a) the responding party fails to establish a prima facie case as to each essential element of any cause of action in the complaint; or SSX-L-000185-24 07/26/2024 4:19:21 PM Pg 13 of 29 Trans ID: LCV20241867599 9 (b) the moving party establishes that: (i) the responding party failed to state a cause of action upon which relief can be granted; or (ii) there is no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law on the cause of action or part of the cause of action.

N.J.S.A. §2A:53A-55(a). Further, the statute requires that courts promote uniformity of the law with respect to its subject matter among states that enact it. N.J.S.A. §2A:53A-60.

UPEPA provides that attorneys’ fees, court costs and reasonable litigation expenses shall be awarded to the responding party “if the responding party prevails on the order to show cause and the court finds that the order to show cause was frivolous or filed solely with intent to delay the proceeding.” N.J.S.A. §2A:53A-58.

a. Defendants do not Satisfy the First Step Under the Act Because the Plaintiff is Not Violating the Defendants' First Amendment Rights

The first step of UPEPA requires that the alleged defamatory statements are based on a person's "(1) communication in a legislative, executive, judicial, administrative, or other governmental proceeding; (2) communication on an issue under consideration or review in a legislative, executive, judicial, administrative, or other governmental proceeding; or (3) exercise of the right of freedom of speech or of the press, the right to assembly or petition, or the right of association, guaranteed by the United State Constitution or the New Jersey Constitution, on a matter of public concern." N.J.S.A. §2A:53A-50(b)(3).

Here, the Board's claims are based on the Defendants' conduct, specifically the intentional disruption of government operations through a pattern of abusive requests to burden the efficient operation of government. The mere fact that Defendants' conduct stems from OPRA requests does not transform said conduct into a protected activity. The OPRA legislation itself recognizes that said activities can substantially disrupt the operation of government, and why the Legislature revised the OPRA legislation to permit a governmental entity to seek a protective order. See N.J.S.A. §47:1A-5.1

The Defendants are attempting to essentially argue that all OPRA requests are protected under the UPEPA. However, if that was the case, then the Legislature's revisions to N.J.S.A. §47:1A-5.1 would be rendered meaningless. Additionally, it is worth noting that the Anti-SLAPP and OPRA

legislation are contemporaneous with each other. Therefore, both pieces of legislation must be read together to give them proper effect to gleam the Legislature's intent. When done so, it becomes quite apparent that the two pieces of legislation do not intersect with each other and in fact operate on separate parallel planes. Under the Anti-SLAPP statute (N.J.S.A. 2A:53A-50 et seq.), the courts must determine if lawsuit targets free speech on a matter of public concern. If so, the court can dismiss the complaint and award the defendant with counsel fees, without filing a separate lawsuit; thereby, making the remedy immediate.

▪ **As to Free Speech and the Right to Petition
the Government for Grievances**

Article 1, paragraph 18 of the New Jersey Constitution provides: "The People have the right freely to assemble together, to consult for the common good, to make known their opinions to their representatives, and to petition for redress of grievances." N.J. Const. art. 1, ¶ 8. New Jersey courts rely on federal constitutional principles in interpreting the free speech clause of the New Jersey Constitution. Tarus v. Borough of Pine Hill, 381 N.J. Super. 424 (App. Div. 2005); Johnson v. Yurick, 156 F. Supp.2d 427, 436 (D.N.J. 2001); Binkowski v. State, 322 N.J. Super. 359, 369 (App. Div. 1999). Under Article 1, paragraph 18 of the New Jersey Constitution, the Defendants have "the right ... to make known their opinions to their representatives, and to petition for redress of grievances." These free speech guarantees are "broader than the right against governmental abridgement of speech found in the First Amendment[.]" N.J. Coal. Against War in the Middle East v.

J.M.B. Realty Corp., 138 N.J. 326, 353 (1994). While there is a constitutional right to petition the government for redress of grievances, there is no constitutional right to have the government respond to that petition. Newton v. Greenwich Twp., 2012 WL 3715947 at **2-3 (D.N.J. Aug. 27, 2012) (citing MN St. Bd. for Comm. Colls. v. Knight, 465 U.S. 271, 285 (1984) (“Nothing in the First Amendment ... suggests that the right to speak, associate, and petition require government policymakers to listen or respond to individuals' communications on public issues.”)). However, the filing of OPRA requests does not present a grievance to the Board. The act of filing an OPRA request is a request for documents from a public entity. The Board’s protective order will not diminish any of the Defendants from exercising their rights under free speech or petition the Board with their opinion. The Board is simply seeking relief under N.J.S.A. §47:1A-5.1 from the pattern of harassment from the Defendants. Therefore, the Defendants failed to satisfy the first prong of UPEPA.

b. The Board Satisfies the Second Step as the Verified Complaint States a Claim Upon Which Relief may be Granted

In the event the Court determines that UPEPA applies, the second step of the statute requires the responding party to establish a prima facie case as to each element of any cause of action in the complaint or that the moving party establish that plaintiff failed to state a claim upon which relief may be granted; or, alternatively, that there is no genuine issue of material

fact and that the moving party is entitled to judgment as a matter of law. N.J.S.A. §2A:53A-55(a)(3).

The Board's Verified Complaint that was filed pursuant to N.J.S.A. §47:1A-5.1, adequately pleads a claim for a protective order in this matter. The applicable standard that governs this matter is that the Board must meet its ultimate burden at the trial phase and not at the pleading stage, as set forth by Defendants. At the pleading stage of litigation, the Board must merely allege facts that, if proven, satisfy the clear and convincing standard. Therefore, the cumulative pattern of fourteen requests over a twelve months period as set forth by the Board in their Complaint, along with allegations of repeated requests for the same records with slight variation, overlapping OPRA- requests submitted by family members, four OPRA lawsuits, two appeals, and the creation of a portal designed to deceive members of the public all support a plausible inference of intent to substantially interrupt the governmental functions of the Cherry Hill School District.

Defendants attempt to argue that their cooperation in responding to requests defeats any inference of disruptive intent. Once again, Defendants' assertions and arguments are misplaced to conflate multiple issues with bald assertions and through deception to tactically narrow issues, to illustrate partial compliance in an attempt to persuade the court that their requests are made without the intent of disruption. However, at this early pleading stage, the Board needs only to allege facts that support a plausible

inference of intent; the Defendants' characterization of their conduct as cooperative does not, as a matter of law, foreclose that inference.

Not only is the number of OPRA requests at issue here, but the type of requests. The Defendants have created a pattern of harassing the Board with their duplicative and vexatious OPRA requests. Benjamin Shore and Daniel Shore filed a total of three separate OPRA requests requesting the same documents- Third-Party OPRA requests filed with the District. (See ¶12, 28, and 31 of the Verified Complaint, **Exhibit A**). In addition, Benjamin Shore and Shore Investigates filed two separate actions for the same types of records. Each request by the Defendants is purposefully made to attempt to get a different answer from the Board. Similarly, Benjamin Shore has submitted 5 separate requests for surveillance videos at board meetings. (See ¶17, 23, 36, 37, and 39 of the Verified Complaint, **Exhibit A**). Benjamin Shore has also filed ORPA requests for information and emails. (See ¶17, 20 of the Verified Complaint, **Exhibit A**; see also ¶9-13 Certification of Jason Schimpf, **Exhibits A-E**). Benjamin Shore has also submitted 6 separate requests for legal invoices concerning his litigated matters. (See ¶24, 26, 30, 32, 33, and 35 of the Verified Complaint, **Exhibit A**). Clearly this is harassing behavior as Benjamin Shore is filing litigation against the Board and then requesting the legal invoices of counsel that is defending the Board against his litigation.

Discovery is essential for the Board to develop their evidence of demonstrating the burden and disruption of government function through

Defendants' repeated OPRA requests. Therefore, when discovery is completed the Board will have developed evidence that will demonstrate the oppressive nature of said requests, i.e., staff hours that would need to be devoted to process said requests, the custodian's workload and diversion of resources from his or her other duties, counsel devoted to responding to said requests, defending litigation, and advising the agency on OPRA compliance, and the impact on governmental operations and ability to conduct other business, and the costs associated with the diversion of resources to OPRA compliance.

The Defendants' mere reliance on Governor Murphy's signing statement mischaracterizes the purpose of a gubernatorial message in statutory interpretation by the courts. The words of a politician spinning his or her decision to the media do not usurp or preempt the written word of the legislation. While a court may consider a governor's message in signing a bill into law as part of the legislative history and can find such messages persuasive, such messages, however, do not displace the plain language of the statute itself or the Legislature's express authorization.

The undisputed facts are that the New Jersey Legislature enacted UPEPA in 2023 and the relevant OPRA amendments in 2024. The OPRA amendments which authorized the Plaintiff's protective order were approved with UPEPA already existing, as such, the New Jersey Legislature intended that a protective order to prevent harassing and disruptive OPRA requests would not constitute a violation of UPEPA.

The New Jersey Courts have repeatedly "emphasized repeatedly that when interpreting a statute, our overriding goal must be to determine the Legislature's intent." Cornblatt v. Barow, 153 N.J. 218, 231, 708 A.2d 401 (1998). Our courts have further held that the statute's language is ordinarily the "surest indicator" of that intent. *Ibid.* If the language is plain and clearly reveals the statute's meaning, the Court's sole function is to enforce the statute according to its terms. *Ibid.*; (See *Frugis v. Bracigliano*, 177 N.J. 250, 280).

For purposes of this action a relevant canon of statutory construction sets forth that the objective of such interpretation "is to discern and effectuate the intent of the Legislature." Murray v. Plainfield Rescue Squad, 210 N.J. 581, 592, 46 A.3d 1262 (2012) (citing Allen v. V & A Bros., 208 N.J. 114, 127, 26 A.3d 430 (2011)). If the Legislature's intent is clear from the statutory language and its context with related provisions, the the Courts are to apply the law as written. Lozano v. Frank DeLuca Constr., 178 N.J. 513, 522, 842 A.2d 156 (2004). Only when a statute is ambiguous, or the plain language leads to a result inconsistent with any legitimate public policy objective, or it is at odds with a general statutory scheme should the court move beyond the plain language of the statute.

In construing statutes, courts should give effect to each provision and they should be "interpreted so they do not conflict." 1A Norman J. Singer & J.D. Shambie Singer, *Sutherland Statutory Construction* § 22:34 at 395-96 (7th ed. 2007). When, within a common subject matter, some statutory

provisions pertain to one set of circumstances and some to another, the judicial function is "to make every effort to harmonize them, even if they are in apparent conflict." Saint Peter's Univ. Hosp. v. Lacy, 185 N.J. 1, 14, 878 A.2d 829 (2005).

The Legislature, in enacting N.J.S.A. 47:1A-5.1, clearly expressed and authorized governmental entities' suits against defendants where there are patterns of abusive OPRA requests, with the clear backdrop that said entities must prove said patterns by clear and convincing evidence. Whereas UPEPA is clearly limited to instances where an action is taken against a party because that party engaged in the statutorily defined protected activity, which does not include OPRA requests. Furthermore, this is common sense because the simple act of repetitively requesting voluminous documents is not protected activity under UPEPA and does not equal public speech. Certainly, these Defendants would not have the audacity to argue that creating a website intended to deceive the public that it was the Board and provide commercial advertising for the attorney representing these Defendants, falls within the scope of UPEPA. While some folks have made a cottage industry out of OPRA and disruption of the efficient operation of public entities, our Legislature certainly did not intend to protect those person and entities under the UPEA, and the Plaintiff does not rely on a politician's statements to the media, but on the words of the enacted legislation.

Therefore, it is clear that the Legislature determined that certain request patterns warrant judicial intervention. Moreover, the very existence of the high burden that governmental entities must meet demonstrates that the Legislature contemplated agency suits and built in substantial protections for requestors. The statute is not a blank check for a governmental entity to deny all OPRA requests, as it requires the governmental entity to prove its case by a very demanding evidentiary standard. If the Court was to give weight to Defendants' contradictory arguments, it would give little effect to N.J.S.A. §47:1A-5.1. Therefore, the second prong of UPEPA has been met by the Board, and thus, the Defendants' Order to Show Cause should be denied.

As the UPEPA does not apply to the within matter, the Board respectfully requests that the Court deny the Defendants' request for an award of court costs and attorneys' fees.

III. THE BOARD PROPERLY PLEAD ALLEGATIONS IN COUNT TWO AGAINST THE DEFENDANTS

The Defendants have violated N.J.S.A. §56:8-227 when they sought to conduct business with the Board and created a website similar to the Board's website as an OPRA portal for purposes of deceiving the public. N.J.S.A. §56:8-227 provides as follows:

a. It shall be an unlawful practice and a violation of [N.J.S.A. 56:8-1] et seq. for any person to send a mailing which **constitutes a solicitation by a nongovernmental entity for the purchase of or payment for a product or service which could reasonably be interpreted as falsely implying any State government connection, approval, or**

endorsement through the use of a seal; insignia; citation to a State statute; name of a State agency, department, commission, or program; trade or brand name; or any other term or symbol.

N.J.S.A. §56:8-227(a) (emphasis added). It is well established that “official functions include those duties which are imposed by law as well as those which are clearly inherent in and naturally arise from the nature of the office. State v. Lore, 197 N.J. Super. 277, 282 (App.Div.1984); State v. Maioranna, 225 N.J. Super. 365, 371. The managing of the Board’s OPRA portal is within the “official functions” of the Board. Here, the Defendant Benjamin Shore is attempting to solicit business through his OPRA portal while mimicking the Board’s duties under the OPRA law to respond to OPRA requests.

Moreover, N.J.S.A. §56:8-2.1 provides:

It shall be an unlawful practice for any person to operate under a name or in a manner which wrongfully implies that such person is a branch of or associated with any department or agency of the Federal Government or of this State or any of its political subdivisions, or use any seal, insignia, envelope or other format which simulates that of any governmental department or agency.

Additionally, N.J.S.A. §2C:21-17 criminalizes impersonation through electronic communications, including websites, when done with the intent to obtain a benefit, injure, or defraud another. As such, it is a violation of the law to wrongfully imply association with a department or agency of the federal or state government. DeSimone v. Springpoint Sr. Living, Inc., 256

N.J. 172, 182 (2024). Thus, the Defendant's website wrongfully implies that it is associated with the Board and has caused confusion to the public.

The Defendants' OPRA website acts as a portal to submit OPRA requests from a third-party requestor to the Board. The Website "could reasonably be interpreted as falsely implying ... connection, approval or endorsement" by the Board. The Website looks strikingly similar the Board's website. The name of the Website is "The Cherry Hill Public Schools OPRA Request Portal" ("The Website")- www.chpsopra.com, clearly states Cherry Hill Public Schools's name. There are no clear indicators that the website is not run by the Board. The name of the Website does not differentiate itself in any way from the Board. Once you open the Website, the colors on the Website are very similar to the Board's official colors-red and white. The Website also advertises for attorneys to file OPRA appeals. Benjamin Shore even advertises his website as a means to obtain OPRA's from the Board without explaining that he is not a Board representative. There are also significant privacy issues with the Website, as the public is under the belief that it is managed by the Board and unknowingly waiving their privacy rights with the filing of ORPA requests on Benjamin Shore's website.

Furthermore, Benjamin Shore has sent several emails to the custodian of records and the Superintendent seeking to conduct business with the Board for OPRA matters. On December 3, 2025, Benjamin Shore sent an email to Superintendent Kwame Morton advertising his website "OPRApro.com" and again improperly seeking to conduct business with the

District. (See ¶63 of the Verified Complaint, **Exhibit A**). He then sent a second email on December 3, 2025, to Jason Schimpf advertising his website “OPRApro.com” and stated, “[t]his will make your life much easier and can save the districts hundreds of thousands of dollars.” Id. at 64.


The Board has properly alleged sufficient facts in its Verified Complaint to support Count Two against the Defendants regarding the Website. Discovery will yield additional information as to the evidence of payments received by the Defendant for the services procured through the website.

CONCLUSION

The Plaintiff, Cherry Hill Board of Education, respectfully requests that the Defendants' Order to Show Cause be denied in its entirety.

METHFESSEL & WERBEL, ESQS.

Attorneys for Cherry Hill Township
Board of Education

By: _____
Brent R. Pohlman

DATED: April 30, 2026

Our File No. 97628

CERTIFICATE OF MAILING

The undersigned hereby certifies as follows:

1. I am employed by the law firm of Methfessel & Werbel.
2. On April 28, 2026 the undersigned prepared and forwarded copies of the within correspondence to the following parties:

VIA ECOURTS FILING

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

VIA EMAIL: cgriffin@pashmanstein.com

CJ Griffin, Esq.
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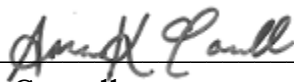
VIA EMAIL: ibromberg@pashmanstein.com

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Pashman Stein Walder Hayden PC
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Hackensack, NJ 07601

VIA LReX – COURTESY COPY

Honorable Michael S. Mikulski II, J.S.C.
Camden County Superior Court
101 South 5th Street, 4th Floor
Camden, NJ 08103

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



Anna Carroll

EXHIBIT A



METHFESSEL & WERBEL

A Professional Corporation

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JOHN METHFESSEL, JR.>
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≤Member of NJ, ID & NM Bar
≥Member of NJ, PA & DC Bar
~Member of NY, NJ & DC Bar
=Member of NY, NJ & MA Bar
±Member of NY, NJ & FL Bar

Please reply to New Jersey

February 20, 2026

VIA CERTIFIED MAIL

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

RE: **CHERRY HILL TOWNSHIP BOE VS. SHORE INVESTIGATES,
ET AL.**

Our File No. : 97628 ELH
Docket No. : TBA

Dear Sir or Madam:

Enclosed please find the following documents:

- ☒ Verified Complaint for Protective Order
- ☒ Designation of Trial Counsel
- ☒ CIS Form

Very truly yours,

METHFESSEL & WERBEL, ESQS.

Eric L. Harrison
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ELH:akc/Encl.
Complaint

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 Our File No. 97376 CMM

CHERRY HILL TOWNSHIP BOARD
 OF EDUCATION,

 Plaintiff

 V.

 SHORE INVESTIGATES, LLC,
 DANIEL SHORE, AND BENJAMIN
 SHORE,

 Defendants

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION: CAMDEN COUNTY
 DOCKET NO.:

Civil Action

VERIFIED COMPLAINT FOR
 PROTECTIVE ORDER

Plaintiff, Cherry Hill Township Board of Education, by way of Verified Complaint complains against the Defendants, Shore Investigates, LLC, Daniel Shore, and Benjamin Shore, as follows:

PARTIES

1. Plaintiff Cherry Hill Township Board of Education (“Board” or “District”) is a body corporate under the laws of the State of New Jersey and is charged with the supervision of the public schools in the Township of Cherry Hill pursuant to N.J.S.A. § 18A:1-1 et seq. and has its primary place of business located at 45 Ranaldo Terrace, Cherry Hill, NJ 08034.

2. Jason Schimpf (the “Custodian”) is employed by the Cherry Hill Township Board of Education as the Assistant Superintendent/Business

Administrator/Board Secretary and serves as the Custodian of Records for the Board.

3. Defendant Shore Investigates, LLC (“Shore Investigates”) is a foreign corporation incorporated in Colorado with headquarters located at 1500 N. Grant St., Ste R, Denver, Colorado 80203.

4. Defendant Benjamin Shore is the owner and chief operating officer of Shore Investigates, LLC and presently resides at 12 Manor House Court, Cherry Hill, New Jersey 08003.

5. Daniel Shore is, upon information and belief, the brother of Benjamin Shore and is affiliated with Shore Investigates, LLC and resides at 107 N. Sumner Avenue, Margate City, New Jersey 08402 and who has filed an Open Public Records Act request with the Board with the email address shoreinvestigates@gmail.com.

FACTS COMMON TO ALL COUNTS

6. The Board, as a public entity, is subject to the provisions of New Jersey’s Open Public Records Act (“OPRA”), N.J.S.A. § 47:1A-1, et seq. and, as such, is required to respond to certain requests by members of the public, relative to the provision of public records of the District.

7. Benjamin Shore has a long demonstrable history of filing numerous cumbersome, vexatious and, at times, invalid OPRA requests with the Board.

8. In the past year, Benjamin Shore has submitted such OPRA requests under his own name and/or Shore Investigates utilizing alternating and, at times, novel email addresses.

9. In the last year, Benjamin Shore and/or Shore Investigates has filed at least nine separate, but duplicative, OPRA requests for videos and documents.

10. In the last year, Benjamin Shore and/or Shore Investigates has filed separate and duplicative OPRA requests seeking the OPRA requests submitted by other individuals and the District's responses.

11. These OPRA requests are duplicative, onerous, and meant to harass the Board.

12. On January 16, 2025, Benjamin Shore filed the following request under OPRA and New Jersey's common law:

- (A) OPRA requests submitted to the district from Jan. 1, 2023 – December 31, 2024.
- (B) Responses to OPRA request submitted to the district from Jan. 1, 2023- December 31, 2024 that were denied.

See annexed hereto a true and accurate copy of the email from Benjamin Shore to Lynn Shugars dated January 16, 2025 as **Exhibit A**.

13. On or about January 31, 2025, the District responded to the foregoing January 16, 2025 OPRA request by providing copies of said requests and responses which were redacted of each requestor's personal information. Ibid.

14. On or about February 24, 2025, Benjamin Shore filed a Verified Complaint in the Superior Court complaining that the Board's response to his OPRA request dated January 16, 2025 was improper; that matter is

captioned and docketed as Benjamin Shore v. Cherry Hill Public Schools and Lynn E. Shugars, Docket CAM-L-594-25 (“Redaction Appeal”).

15. On or about May 19, 2025, the Court issued an Order denying Benjamin Shore’s requested relief and upholding the Board’s redactions to the responsive documents. See annexed hereto a true and accurate copy of the Court Order dated May 19, 2025 as **Exhibit B**.

16. On or about August 15, 2025, the Court issued an Order denying Benjamin Shore’s Motion for Reconsideration of the Court’s May 19, 2025 Order denying his requested relief in the “Redaction Appeal”. See annexed hereto a true and accurate copy of the Court Order dated August 15, 2025 as **Exhibit C**.

17. On February 26, 2025, Benjamin Shore filed an OPRA and common law request via email for the surveillance video from the February 2025 Board meeting. See annexed hereto a true and accurate copy of the email from Benjamin Shore to Lynn Shugars dated February 26, 2025 as **Exhibit D**.

18. On or about March 7, 2025, the District denied Benjamin Shore’s February 24, 2025 OPRA request based upon OPRA’s exception for security and surveillance techniques which would compromise the District’s security measures. Ibid.

19. On or about March 9, 2025, Benjamin Shore filed a Verified Complaint in the Superior Court complaining that the Board’s response to his OPRA request dated February 26, 2025 was improper; that matter is

captioned and docketed as Benjamin Shore v. Cherry Hill Public Schools and Lynn E. Shugars, Docket CAM-L-815-25 (“Surveillance Appeal”).

20. On or about March 12, 2025, Benjamin Shore filed an OPRA request for emails related to “Re: Opra meeting” between Ms. Rosen and the Director of Security. See annexed hereto a true and accurate copy of the email from Benjamin Shore to Lynn Shugars dated March 12, 2025 as **Exhibit E**.

21. On or about August 13, 2025, the Court denied Plaintiff’s request for the “surveillance video” of the Board’s meeting in the Docket CAM-L-815-25 and held that the Board properly denied Benjamin Shore’s OPRA request based on security concerns. See annexed hereto a true and accurate copy of the Court Order dated August 13, 2025 as **Exhibit F**. Nonetheless, Benjamin Shore has continued to file OPRA requests for the same security footage.

22. On or about January 2, 2026, the Court denied Benjamin Shore’s Motion for Reconsideration of the “Surveillance Appeal” upholding the Board’s denial of Benjamin Shore’s OPRA request for the surveillance video of the February 2025 Board Meeting. See annexed hereto a true and accurate copy of the Court Order dated January 2, 2026 as **Exhibit G**.

23. On or about August 20, 2025, one week after the Court’s above-referenced decision, Benjamin Shore, on behalf of Shore Investigates, submitted the following OPRA request, which request is duplicative of the

February 26, 2025 OPRA request that had just been denied; however, the request was submitted under the “Shore Investigates LLC” name:

Security camera video that is directed at the Board of Education dais and captures the Board members reactions during the last thirty minutes of the February 25, 2025 public meeting of the Cherry Hill Board of Education. If the above is burdensome, please instead provide only the approximately three minutes correspondence to my public comment during that meeting.

See annexed hereto a true and accurate copy of the OPRA request filed by Benjamin Shore dated August 20, 2025 as **Exhibit H**.

24. On or about August 28, 2025, Benjamin Shore, on behalf of Shore Investigates, LLC, filed an OPRA request for legal invoices related to Docket CAM-L-594-25. See annexed hereto a true and accurate copy of the OPRA request filed by Benjamin Shore dated August 28, 2025 as **Exhibit I**.

25. On September 15, 2025, the Board responded with responsive documents to Benjamin Shore’s OPRA request for legal invoices for Docket CAM-L-594-25. See annexed hereto a true and accurate copy of the email from Jason Schimpf to Benjamin Shore dated September 15, 2025 as **Exhibit J**.

26. On or about September 16, 2025, Benjamin Shore filed an OPRA and common law request for legal invoices related to the District’s defense in the lawsuit concerning Docket CAM-L-815-25. See annexed hereto a true and accurate copy of the email from Benjamin Shore to Jason Schimpf dated September 16, 2025 as **Exhibit K**.

27. On or about September 17, 2025, Benjamin Shore filed an OPRA and common law request seeking copies of the District's insurance policies. See annexed hereto a true and accurate copy of the email from Benjamin Shore to Jason Schimpf dated September 17, 2025 as **Exhibit L**.

28. On or about September 17, 2025, Benjamin Shore filed an OPRA and common law request for OPRA requests submitted to the District between January 1, 2025 and March 31, 2025. See annexed hereto a true and accurate copy of the email from Benjamin Shore to Jason Schimpf dated September 17, 2025 as **Exhibit M**.

29. On or about September 29, 2025, the Board responded to Benjamin Shore's September 17, 2025 OPRA request with responsive redacted documents along with a Vaughn Index. See annexed hereto is a true and accurate copy of the email from Jason Schimpf to Benjamin Shore dated September 29, 2025 as **Exhibit N**.

30. On or about October 22, 2025, Benjamin Shore submitted an OPRA request through his website seeking legal invoices from Paul Green, Esq., from September 1, 2025 to present. See annexed hereto a true and accurate copy of the OPRA request filed by Benjamin Shore dated October 22, 2025 as **Exhibit O**. The Board provided responsive documents. Ibid.

31. On or about October 25, 2025, Daniel Shore of Shore Investigates filed an OPRA and common law request for OPRA requests submitted to the District from Jan. 15, 2023 – December 15, 2024. See annexed hereto a true and accurate copy of the OPRA request filed by Daniel

Shore on behalf of Shore Investigates dated October 25, 2025 as **Exhibit P**. This was previously requested by Benjamin Shore in January 2025.

32. On or about November 11, 2025, Benjamin Shore sent an email to Jason Schimpf requesting a monthly update of legal invoices from the Board in order to support his “dashboard that tracks CHPS legal spending.” See annexed hereto a true and accurate copy of the email from Benjamin Shore to Jason Schimpf dated November 11, 2025 as **Exhibit Q**.

33. On or about November 23, 2025, Benjamin Shore filed an OPRA request through his OPRA website seeking “legal bills related to the creation of CHSOPRA.com at present.” See annexed hereto a true and accurate copy of the OPRA request filed by Benjamin Shore dated November 23, 2025 as **Exhibit R**.

34. On or about December 4, 2025, Mr. Schimpf provided Benjamin Shore with the responsive documents with appropriate redactions. Ibid.

35. On or about December 2, 2025, Benjamin Shore filed an OPRA request for legal invoices associated with replying to his motion to remand that was filed by the District on December 1, 2025; this related to his Notice of Appeal of the denial of his Order to Show Cause for Docket CAM-L-594. See annexed hereto a true and accurate copy of the OPRA request filed by Benjamin Shore dated December 2, 2025 as **Exhibit S**.

36. On or about January 1, 2026, Benjamin Shore filed yet another request under OPRA and the common law for the surveillance video

of the Board meeting held on February 25, 2025. See annexed hereto a true and accurate copy of the email from Benjamin Shore to Jason Schimpf dated January 1, 2026 as **Exhibit T**.

37. On or about January 9, 2026, Benjamin Shore filed an OPRA request seeking the security camera footage from the Board's meeting held on December 16, 2025. See annexed hereto a true and accurate copy of the OPRA request filed by Benjamin Shore dated January 9, 202 as **Exhibit U**.

38. On or about January 14, 2026, Mr. Schimpf denied Benjamin Shore's request and provided that the "releasing of the requested security footage would compromise the integrity of the District's security system by revealing its capabilities and vulnerabilities." See annexed hereto a true and accurate copy of the email from Jason Schimpf to Benjamin Shore dated January 14, 2026 as **Exhibit V**. Mr. Schimpf offered Benjamin Shore the opportunity to review the footage in person at the District's office, which was rejected. Ibid.

39. Despite having a valid decision from this Court, on February 10, 2026, Benjamin Shore filed a Verified Complaint entitled Benjamin Shore v. Jason Schimpf, in his official capacity as Records Custodian and Cherry Hill Township Board of Education, which bears Docket #CAM-L-477-26, concerning the denial of his January 9, 2026 OPRA request for surveillance video of the December 16, 2025 Board meeting. See annexed hereto a true and accurate copy of Benjamin Shore's Verified Complaint dated February 10, 2026 as **Exhibit W**.

40. Throughout the pendency of both the Redaction Appeal and the Surveillance Appeal, Benjamin Shore has made various and repeated demands for settlement of the aforementioned litigated OPRA matters to the handling attorneys, the Custodian, the Board's General Counsel, and the Board directly.

41. The foregoing demands for settlement include, but are not limited to, promises to refrain from submitting further OPRA requests to the Board in the future for some proscribed period of time.

COUNT ONE

(N.J.S.A. § 47-1A-5.1: Protective Order Under New Jersey's Open Public Records Act)

42. Plaintiff repeats and realleges all the allegations set forth in the preceding paragraphs as if fully set forth herein.

43. Benjamin Shore's OPRA requests have been repetitive, duplicative, and are meant to harass the Board's regular business operations of running eighteen (18) public schools.

44. Benjamin Shore's OPRA repetitive requests for the same surveillance video of the February 2025 on at least three separate occasions are without a valid, legal basis and are vexatious since the Superior Court of New Jersey has already upheld the appropriateness of the District's denial of said request. He has continued to harass the Board and recently filed a new legal action seeking the release of the surveillance footage from the December 2025 Board meeting.

45. Benjamin Shore's OPRA repeated requests for copies of the unredacted OPRA requests submitted by individuals are without a valid, legal basis and are vexatious as the Superior Court of New Jersey has already upheld the District's valid redactions.

46. Benjamin Shore's numerous, repeated and vexatious OPRA requests have accompanied baseless demands for settlement in a clear and apparent attempt to intimidate and coerce the District into capitulating to his settlement demands.

47. Benjamin Shore's numerous, repeated and vexatious OPRA requests have accompanied numerous and significant attempts to negotiate each request with the Custodian requiring the expenditure of over one hundred (100) hours of District staff time in reviewing and redacting records as well as answering said requests.

48. Benjamin Shore's numerous OPRA requests have substantially interrupted the performance of District operations and required the District to focus on responding to Benjamin Shore's OPRA requests.

WHEREFORE, the District demands the Court enter a Permanent Injunction and Protective Order against Benjamin Shore, Daniel Shore, and Shore Investigates, LLC limiting the number of OPRA requests that can be submitted to the Cherry Hill Board of Education within a twelve (12) month period.

COUNT TWO

N.J.S.A. § 56:8-227 SOLICITATION BY NONGOVERNMENTAL ENTITY AND IMPROPER USE OF PLAINTIFF-PUBLIC ENTITY'S LIKENESS AND APPEARANCE FOR COMMERCIAL PURPOSES.

49. Plaintiff repeats and realleges all the allegations set forth in the preceding paragraphs as if fully set forth herein.

50. In or around October 2025, it became known to the Board that Plaintiff had created a website entitled, "Cherry Hill Public Schools OPRA Request Portal." See annexed hereto is a true and accurate printout of Benjamin Shore's website as **Exhibit X**. The world wide web address is <https://chpsopra.com/>.



51. The Board's website address is <https://www.chclc.org/departments/public-information> and provides a portal for members of the public to submit OPRA requests. See annexed hereto is a true and accurate printout and screen shot of the Board's website as **Exhibit Y**.



52. Plaintiff's website is strikingly similar to the Board's website for OPRA requests as it has a similar banner at the top of the page and states that it is the OPRA portal for the "Cherry Hill Public School," utilizes a similar font to the Board's website and otherwise appears as if it is affiliated with the District.

53. The website contains no disclaimer to indicate that it is not affiliated with the Cherry Hill Public School District.

54. Defendant, Benjamin Shore's website has caused confusion with members of the public believing that his website was the Board's official website through which official OPRA requests to the District are submitted.

55. On or about October 25, 2025, Mr. Schimpf sent Benjamin Shore an email requesting the deactivation of website Shore had created for the purpose of the public's use to submit OPRA requests to the District. Mr. Schimpf stated:

It has come to our attention that you have created an electronic portal for submitting OPRA requests to the Cherry Hill Public School District. While we appreciate your interest in supporting community engagement, we would like to clarify that this portal is not affiliated with, endorsed by, or authorized by the Cherry Hill Board of Education. To ensure transparency, accuracy, and compliance with our internal procedures, we respectfully request that you deactivate

the portal and refrain from accepting or forwarding OPRA requests on behalf of the district. All OPRA requests must be submitted through the district's official channels to be properly processed.

See annexed hereto a true and accurate copy of the email from Jason Schimpf to Benjamin Shore dated October 25, 2025 as **Exhibit Z**. Benjamin Shore refused to deactivate his website. Ibid.

56. On or about October 27, 2025, the Board sent Benjamin Shore a cease and desist letter regarding the website to no avail. See annexed hereto is a true and accurate a correspondence to Benjamin Shore from Katherine Gilfillan, Esq. as **Exhibit AA**.

57. Plaintiff spoke during the public comment section of the Board's next public meeting held on October 28, 2025 decrying the propriety of the cease and desist letter.

58. At that same meeting, the Board Solicitor addressed the impropriety of Defendant's website to ensure that the public was aware of the issues of submitting an OPRA request through Defendant's website.

59. At that same public meeting, a member of the public spoke indicating that she had, in fact, submitted such a request through Defendant's website and was unclear as to whether the Board had received the request or not.

60. Subsequent to the issuance of the cease and desist letter, Defendant, Benjamin Shore repeatedly emailed District representatives attempting to convince the District to allow use of his website as a "portal" for members of the public to submit their OPRA requests.

61. Subsequent to his receipt of the Plaintiff's Cease and Desist letter, Benjamin Shore sent numerous emails following the OPRA requests previously referenced urging the District to utilize the foregoing website and clearly seeking a vendor relationship with the District outside of all public bidding requirements.

62. The Plaintiff has appropriately declined Defendant Benjamin Shore's attempts to establish a vendor relationship through the use of his private website to route OPRA requests to the District.

63. On December 3, 2025, Benjamin Shore sent an email to Superintendent Kwame Morton advertising his website "OPRApro.com" and again improperly seeking to conduct business with the District. See annexed hereto a true and accurate copy of the email from Benjamin Shore to Superintendent Morton dated December 3, 2025 as **Exhibit BB**.

64. On December 3, 2025, Benjamin Shore sent an email to Mr. Schimpf advertising his website "OPRApro.com" and stated, "[t]his will make your life much easier and can save the districts hundreds of thousands of dollars." See annexed hereto a true and accurate copy of the email from Benjamin Shore to Jason Schimpf dated December 3, 2025 as **Exhibit CC**.

65. Members of the public have, in fact, submitted OPRA requests through Defendant's website. See annexed hereto a true and accurate copy of an OPRA request from a third party requestor dated January 5, 2026 as **Exhibit DD**.

66. The Board has no ability to control how requests that are made through Defendant, Benjamin Shore's website are processed or forwarded or otherwise transferred to the Board for response.

67. As the Board is bound by the specific timeframes set forth in OPRA, the Board will be severely and legally prejudiced in the event that Defendant, Benjamin Shore fails to forward or otherwise process a request made to the Board.

68. In addition, the email response from the Defendant's website to its users once an OPRA request is submitted, improperly advertises attorneys to file OPRA appeals against the Plaintiff. See annexed hereto a true and accurate copy of the email to Benjamin Shore from noreply@request.chosopra.com dated October 22, 2025 as **Exhibit EE**.

69. Benjamin Shore's requests are not aligned with the meaning of N.J.S.A. 47:1A-1 et seq. and are being used as an attempt to harass the District into a commercial relationship with Plaintiff.

WHEREFORE, the Plaintiff requests judgement as follows:

- a. Issuance of a Protective Order against Shore Investigates, LLC denying the request for relief in his Verified Complaint, Docket CAM-L-3910-25, and attorney fees;
- b. Issuance of a Protective Order against Benjamin Shore denying the request for relief in his Verified Complaint, Docket CAM-L-477-26, and attorney/court fees;

- c. Issuance of a Protective Order against Shore Investigates, LLC and any of its affiliates, including Daniel Shore, prohibiting them from filing requests under the Open Public Records Act and the common law with the Cherry Hill Board of Education for one year;
- d. Issuance of a Protective Order against Benjamin Shore prohibiting Benjamin Shore from filing requests under the Open Public Records Act and the common law with the Cherry Hill Board of Education for one year on his behalf or on behalf of any third party, person or entity;
- e. Issuance of a Protective Order requiring the removal of the website: <https://chpsopra.com/>;
- f. Attorneys' fees and costs of suit; and
- g. Any other relief as the Court may deem proper and just.

METHFESSEL & WERBEL, ESQS.
Attorneys for Cherry Hill Township
Board of Education



By: _____
Eric L. Harrison

DATED: February 20, 2026

DESIGNATION OF TRIAL COUNSEL

PURSUANT to the provisions of Rule 4:25-4, the Court is advised that Eric L. Harrison is hereby designated as trial counsel on behalf of the defendant(s), Cherry Hill Township Board of Education.

METHFESSEL & WERBEL, ESQS.

Attorneys for Cherry Hill Township
Board of Education



By: _____
Eric L. Harrison

DATED: February 20, 2026

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to Rule 4:5-1, it is stated that the matter in controversy is subject to Shore Investigates, LLC v. Cherry Hill Board of Education and Jason Schimpf, Docket: CAM-L-3910-25 and Benjamin Shore v. Jason Schimpf and Cherry Hill Township Board of Education, Docket: CAM-L-477-26, which is pending. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

I further 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).

METHFESSEL & WERBEL, ESQS.
Attorneys for Cherry Hill Township
Board of Education



By: _____
Eric L. Harrison

DATED: February 20, 2026

VERIFICATION

I, Jason Schimpf, do hereby verify the following statements on the following basis:

1. I am the Custodian of Records for the Cherry Hill Township Board of Education.
2. I have read the Verified Complaint and aver that the facts contained therein are true to the best of my knowledge and belief.
3. The documents referenced in the Verified Complaint are true and accurate records of the Cherry Hill Township Board of Education.

DATE: 02/19/2026

By: 

Jason Schimpf, Assistant
Superintendent, Business
Administrator, Board Secretary, and
Custodian of Records for the Cherry Hill
Township Board of Education

EXHIBIT A



Exhibit B

Benjamin Shore <benshore@riseagainsthate.org>

OPRA and Common Law

4 messages

Benjamin Shore <benshore@riseagainsthate.org>
To: "Shugars, Lynn" <lshugars@chclc.org>

Thu, Jan 16, 2025 at 8:46 PM

Dear Ms. Shugars,

Pursuant to OPRA and right under the common law, I respectfully request access to and a copy of:

(A) OPRA requests submitted to the district from Jan. 1, 2023 - December 31, 2024.

(B) Responses to OPRA request submitted to the district from Jan 1, 2023 - December 31, 2024 that were denied.

Thanks!

Rise Against Hate

www.RiseAgainstHate.org

1-800-275-2365

National Headquarters:
Washington, DC



Shugars, Lynn <lshugars@chclc.org>
To: Benjamin Shore <benshore@riseagainsthate.org>
Cc: "Tackett, Deborah" <DTackett@chclc.org>

Wed, Jan 29, 2025 at 6:31 AM

Your OPRA response has been delayed due to needing additional time for review and redaction. I anticipate that you will receive a response by Friday, January 31, 2025.

Lynn E. Shugars
Asst. Superintendent-Business/Business Admin.
Cherry Hill School District
(856) 429-5600 ext. 4328

From: Benjamin Shore <benshore@riseagainsthate.org>
Sent: Thursday, January 16, 2025 8:46:00 PM
To: Shugars, Lynn <lshugars@chclc.org>
Subject: OPRA and Common Law

EXHIBIT B

AMENDED ORDER PREPARED BY THE COURT

Benjamin Shore, Pro Se,
Plaintiff,

v.

Cherry Hill Public Schools

&

Lynn E. Shugars
Defendant.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
CAMDEN COUNTY

DOCKET# L-594-25

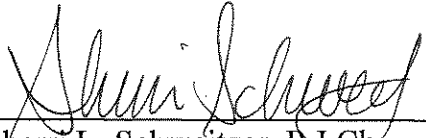
CIVIL ACTION

Amended
ORDER

On May 19, 2025 the court entertained oral argument on the Order to Show Cause and Motion to Dismiss. IT IS ON THE SAME DAY ORDERED, as follows;

1. Defendant's Motion to Dismiss for Failure to State a Claim is GRANTED.
2. Plaintiff's request for Attorney's Fees is DENIED for the reasons set forth on the record
3. Defendants will provide a certification within seven days of this order from Ms. Lynn E. Shugars stating that the documents with extremely small font were received that way and that the school district has no other version.

IT IS FURTHER ORDERED that a copy of this order is to be served upon all parties via ecourts.



Sherri L. Schweitzer, P.J.Ch.

EXHIBIT C

Benjamin Shore <i>Plaintiff,</i> v. CHERRY HILL PUBLIC SCHOOLS and LYNN E. SHUGARS, in her official capacity as Records Custodian, <i>Defendants.</i>	NEW JERSEY SUPERIOR COURT CAMDEN COUNTY LAW DIVISION Civil Action DOCKET NO. CAM-L-594-25 Proposed Order
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**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO VACATE OR, IN THE
ALTERNATIVE, FOR RECONSIDERATION**

THIS MATTER having been brought before the Court by Plaintiff, Benjamin Shore, appearing pro se, by way of Motion to Vacate the Court's Order entered May 19, 2025, or in the alternative, for Reconsideration pursuant to R. 4:50-1 and R. 4:49-2; and the Court having considered the Verified Complaint, the prior record, Plaintiff's supporting Brief and Certification, and any opposition submitted; and for good cause shown;

IT IS on this 15th day of August, 2025, ORDERED as follows:

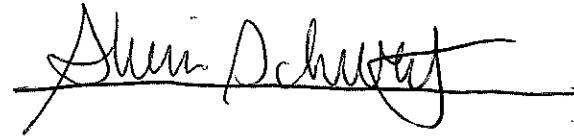
1. Plaintiff's Motion is hereby: GRANTED / GRANTED IN PART / DENIED (circle one).
2. The Court's Order of May 19, 2025 is hereby:

VACATED / AMENDED AS FOLLOWS: _____ /
UNCHANGED (circle one).

3. Defendants shall file an Answer to the Verified Complaint no later than the ____ day of _____, 2025.
4. The Court shall conduct in camera review of the disputed records identified in the Verified Complaint and accompanying exhibits.
5. Plaintiff shall be permitted to cross-examine the Records Custodian at a hearing to be scheduled by the Court.
6. Plaintiff is declared a prevailing party under OPRA.
7. Plaintiff is awarded: COURT COSTS / OTHER: _____
(circle all that apply).

8. Plaintiff's request for oral argument is: GRANTED / DENIED (circle one).
9. The Court shall retain jurisdiction to enforce this Order and consider any fee application filed by Plaintiff.

IT IS SO ORDERED.

A handwritten signature in black ink, appearing to read "Sherri Schweitzer", written over a horizontal line.

SHERRI L. SCHWEITZER, P.J.CH.

EXHIBIT D



Benjamin Shore <benjyshore@gmail.com>

OPRA and common law

Shugars, Lynn <lshugars@chclc.org>
To: Benjamin Shore <benjyshore@gmail.com>

Fri, Mar 7, 2025 at 4:02 PM

Mr. Shore,

In response to your OPRA and common law requests below, we have determined that release of the requested security video footage would compromise the integrity of the security system by revealing capabilities and vulnerabilities of the system. Your requests are denied for these reasons.

Sincerely,

Lynn E. Shugars, CPA

Cherry Hill Public Schools

Assistant Superintendent- Business

Business Administrator/Board Secretary

856-429-5600 Ext. 4328

lshugars@chclc.org

From: Benjamin Shore <benjyshore@gmail.com>
Sent: Wednesday, February 26, 2025 8:53 PM
To: Shugars, Lynn <lshugars@chclc.org>
Subject: OPRA and common law

CAUTION: [EXTERNAL EMAIL]

Hi Mrs. Shugars,

I wanted to make an OPRA and Common Law Request. A few days ago, I spoke at the BOE meeting. The footage online only shows the screen, and I wanted to see the reaction of the Board of Education while I was speaking. I

request security camera footage directed at the Board of Education for the last 30 minutes of this meeting which is referenced to this video posted on the privately owned platform of YouTube:

https://youtu.be/_rER30gBO24?si=yKsZPNfhafnJ58so

If it's easier, I only spoke for 3 minutes. If you could just provide the 3 minutes, that would be great!

I am not a felon. This is not a commercial request, and it is not for litigation.

Please let me know as soon as possible if you need clarification so as not to delay the production of OPRA and common law records.

I look forward to hearing from you.

Thanks,

Ben

Sent from Gmail Mobile

EXHIBIT E



Outlook

OPRA Common Law

From Benjamin Shore <benjyshore@gmail.com>

Date Wed 3/12/2025 10:45 AM

To Shugars, Lynn <lshugars@chclc.org>; Paul H. Green <PHG@spsk.com>

Cc Winters, Gina <ginawinters@chclc.org>

CAUTION: [EXTERNAL EMAIL]

Good morning Mrs. Shugars,

Pursuant to OPRA and right under common law, I am requesting access to and a copy of: (A) Email from [REDACTED] on 3/12/25 9:28 AM, with the subject "Re: Opra meeting," to asaporito@chclc.org. (b) the response from asaporito@chclc.org on March 12, 2025 at 10:35 AM, with the subject line "Re: Opra meeting" to [REDACTED] where the Director of Security advises Mrs. [REDACTED] in response to her request to come in to fill out an OPRA, that "[he is] off until Monday [and] would be glad for [her] to come in then," effectively denying Mrs. [REDACTED] the opportunity to exercise her right to file an OPRA request.

Thanks,
Ben

EXHIBIT F

Benjamin Shore <i>Plaintiff,</i> v. CHERRY HILL PUBLIC SCHOOLS and LYNN E. SHUGARS, in her official capacity as Records Custodian, <i>Defendants.</i>	NEW JERSEY SUPERIOR COURT CAMDEN COUNTY LAW DIVISION Civil Action DOCKET NO. CAM-L-815-25 [PROPOSED] ORDER
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[PROPOSED] ORDER
GRANTING PLAINTIFF'S MOTION TO VACATE THE DENIAL OF HIS MOTION
TO STRIKE DEFENDANTS' MOTION TO DISMISS

THIS MATTER having been brought before the Court by Plaintiff, Benjamin Shore, appearing pro se, by way of motion to vacate the Court's May 19, 2025 ruling denying Plaintiff's Motion to Strike Defendants' Motion to Dismiss; and the Court having considered the Verified Complaint, prior motion filings, the transcript of the May 19, 2025 hearing, and for good cause shown;

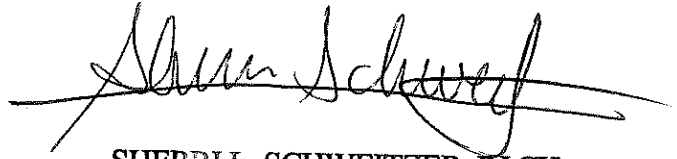
IT IS on this 15th day of August, 2025, ORDERED as follows:

1. Plaintiff's motion is hereby **GRANTED** pursuant to **Rule 4:50-1 and/or Rule 4:49-2**.
2. The Court's prior ruling denying Plaintiff's Motion to Strike is hereby **VACATED**.
3. Defendants' Motion to Dismiss is hereby **STRICKEN** from the record as procedurally improper under Rule 4:67.
4. Defendants, having failed to file an **Answer** as **REQUIRED** by the Court's Order to Show Cause, are deemed in **procedural default**.
5. Defendants shall file an **Answer or other proper responsive pleading** no later than the ____ day of _____, 2025, to cure the default.
6. Plaintiff reserves all rights to seek entry of default and/or default judgment should Defendants fail to comply with this Order.

IT IS SO ORDERED.

8. Plaintiff's request for oral argument is: GRANTED / DENIED (circle one).
9. The Court shall retain jurisdiction to enforce this Order and consider any fee application filed by Plaintiff.

IT IS SO ORDERED.

A handwritten signature in black ink, appearing to read "Sherri L. Schweitzer", written over a horizontal line.

SHERRI L. SCHWEITZER, P.J.CH.

EXHIBIT G

ORDER PREPARED BY THE COURT

BENJAMIN SHORE,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff,	:	CAMDEN COUNTY
	:	
v.	:	
	:	DOCKET NO. CAM-L-815-25
CHERRY HILL PUBLIC SCHOOLS,	:	
	:	
Defendant.	:	CIVIL ACTION
	:	
	:	ORDER

THIS MATTER has come before the Court on November 20, 2025, upon Motion for Reconsideration or, in the alternative, to Vacate, filed by Plaintiff, Benjamin Shore, appearing virtually pro se, and Eric Harrison, Esquire, appearing virtually on behalf of Cherry Hill Public School District for oral argument.

On May 19, 2025, Judge Schweitzer denied Plaintiff's Motion to Vacate the Denial of his Motion to Strike Defendant's Motion to Dismiss on or about May 19, 2025. Plaintiff filed a Motion for Reconsideration of Judge Schweiter's Order on August 25, 2025. Defendant filed a Reply Brief in opposition to said motion on September 4, 2025. The Court recognizes this is a truncated overview of the extensive motion practice this instant litigation has occurred so far.

In Plaintiff's Motion for Reconsideration, Plaintiff points to this court's decision in Demo v. Township of Cherry Hill, (Docket CAM-L-831-25) to argue that the prior court erred in its decision in rejecting his request when an OPRA request in Demo was granted.

The Court finds the facts in Demo are distinguishable to the facts in the instant matter. The Demo court granted limited access to video footage of a ballot box rather than video surveillance recordings of an entire layout of a building; moreover, Demo court's decision falls within the proper exercise of its discretion in that matter with a complete different set of facts and circumstances. To comment further would result this Court improperly usurping the role of the Appellate Division beyond the authority conferred to this Court.

Plaintiff also relies upon States Newsroom Inc. v. City of Jersey City, 089943, 2025 WL 2202105 (N.J. Aug. 4, 2025). There, the States Newsroom Court held that common law right of access entitled plaintiff to requested internal affairs reports with expunged records properly

redacted to protect the interest of both parties. Again, the Court finds the material facts distinguishable from the facts of this instant matter.

In turn, Defense argues that Plaintiff's Motion for Reconsideration should be denied because Plaintiff failed to establish there was a prior mistake, a change in circumstances, or the court's misappreciation of what was previously argued when the Court denied his Order to Show Cause and Motion to Strike.

Defense argues that a motion for reconsideration is governed by strict limitations as articulated in Lawson v. Dewar, 468 N.J. Super. 128, 136 (App. Div. 2021), pursuant to R. 4:49-2, requiring the party seeking reconsideration to "argue in good faith a prior mistake, a change in circumstances, or the court's misappreciation of what was previously argued." Ibid. Defense argues that Plaintiff failed to meet this threshold to justify reconsideration and, in fact, reiterated the same arguments advanced in his initial Motion to Strike and Order to Show Cause.

Moreover, Defense argues that Plaintiff was not initially entitled to the requested surveillance recordings at issue under the common law right of access. In determining whether a citizen's right to access public records outweighs the government's interest in confidentiality, courts apply a balancing test, considering various factors, as set forth in Loigman v. Kimmelman, 102 N.J. 98, 112 (1986). Defense argued that Plaintiff failed to demonstrate that his interest in obtaining the video outweighs the government's compelling interest in maintaining security and integrity of its surveillance system. Nevertheless, the District was reasonable in its response in offering Plaintiff an opportunity to view the surveillance footage in person at the District's office; Plaintiff declined.

Under the Rules of Court, motions for reconsideration are addressed by "the sound discretion of the Court, to be exercised in the interest of justice." Cummings v. Bahr, 295 N.J. Super. 374, 384, 685 A.2d 60 (App.Div.1996) (quoting D'Atria v. D'Atria, 242 N.J. Super. 392, 401, 576 A.2d 957 (Ch.Div.1990)). In Cummings, the Appellate Division explained that:

Reconsideration should be utilized only for those cases which fall into that narrow corridor in which either 1) the Court has expressed its decision based upon a palpably incorrect or irrational basis, or 2) it is obvious that the Court either did not consider, or failed to appreciate the significance of probative, competent evidence...

Id. at 384.

The Court, having reviewed all submissions, the factual records, and oral argument set forth on the record, finds Plaintiff to have not met the requisite standard to grant reconsideration of the prior order on this matter; upon review of the prior decision, this Court finds Plaintiff to have failed to demonstrate the prior order was “based upon a palpably incorrect or irrational basis.” The court’s prior decision to rely upon the better judgment of law enforcement regarding security measures is far removed from irrationality, much less palpably incorrect. Furthermore, Plaintiff’s burden to demonstrate the second prong falls short by a large margin as, to this Court, the assertion of Plaintiff that the court failed to appreciate the significance of probative, competent evidence submitted and argued by Plaintiff, while certain specific arguments of Plaintiff’s may have not been dissected on the record in its findings, is far from obvious. As such, Plaintiff’s Motion for Reconsideration is hereby **DENIED**.

IT IS SO ORDERED.

Date: 01/02/2026


Michael S. Mikulski II, J.S.C.

EXHIBIT H

CHERRY HILL PUBLIC SCHOOLS

RECORDS REQUESTS

New Request Track Search

SIGN IN

Request #OPRA-2025-10

Re: OPRA and common law request, security camera footage of the February 25, 2025 public Board of Education meeting Dear Records Custodian, Shore Investigates is a nonprofit investigative reporting project focused on government transparency and public accountability in South Jersey. Pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access, I request the following public records: Requested records 1. Security camera video that is directed at the Board of Education dais and captures the Board members reactions during the last thirty minutes of the February 25, 2025 public meeting of the Cherry Hill Board of Education. 2. If the above is burdensome, please instead provide only the approximately three minutes corresponding to my public comment during that meeting. Reference link The meeting is posted on YouTube at: https://youtu.be/_rER30gBO24?si=yKsZPNfhafnJ58so Format Please provide an electronic copy in MP4 or another common digital format, delivered by email or a downloadable link. If the file is large, a cloud link is acceptable. If the video contains audio, please include it. Narrow tailoring and redactions This request targets only cameras that show the Board dais and elected officials during the public, live streamed meeting. It does not seek footage of entrances, exits, camera placements, or other sensitive angles. If you believe any portion would reveal security sensitive details, please produce the video with narrowly tailored measures, for example cropping to the dais view, blurring non relevant areas, masking overlays that reveal camera identifiers, or producing only the three minute segment tied to my public comment. Please avoid withholding in full if partial disclosure is feasible, and provide a redaction log that identifies the legal basis and the nature of each redaction. OPRA compliance items - If you contend any exemption applies, please identify each exemption with specificity and provide a particularized explanation linked to the content being withheld. General statements about hypothetical risks are not sufficient to withhold a record in full, and OPRA requires segregation and release of non exempt portions. - If you assert that inspection in person is the only option, please identify the legal basis and explain why an electronic copy cannot be provided even though the record is a digital video. - Please advise of any



New Request




Track



Search

at a public meeting. During my public comment, the livestreamed feed did not show the Board dais, leaving the public without any visual record of how elected officials received the remarks. The requested security camera view is the only recording that can complete the public record of that exchange so the community can witness, in full detail, the Board's demeanor during public comment. See N.J.S.A. 10:4-7, which provides, in relevant part, that "The Legislature finds and declares that the right of the public to be present at all meetings of public bodies, and to witness in full detail all phases of the deliberation, policy formulation, and decision making of public bodies, is vital to the enhancement and proper functioning of the democratic process." The public interest in disclosure is strong and the privacy interests are minimal. The footage sought depicts elected officials acting in their official capacity during a public meeting that was already open to the public and live streamed. I request the dais facing view precisely to avoid revealing non relevant areas. Any residual security concern can be addressed through the narrow tailoring described above. I am requesting this footage for newsgathering and public dissemination by Shore Investigates, not for commercial resale and not for use in litigation. Additional context supports disclosure. The District publicly releases videos that reveal building exteriors and interiors, and at times, images of security monitors. These publicly released materials are far more revealing than a tightly cropped dais angle for a few minutes during a public meeting. For these reasons, both OPRA and the common law right of access favor disclosure here, with any necessary and narrowly tailored redactions. Please confirm receipt of this request. OPRA requires a response within seven business days. If you need clarification, please contact me promptly so production is not delayed. If access is denied in whole or in part, please provide the reasons for the denial, the statutory citations relied upon, the custodian's name and signature, and instructions for appeal. Examples of my reporting 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/from-bodycam-to-courtroom-the-red-acura-road-rage-case-ends-with-a-guilty-plea-and-90-fine-3b7a319f1618> I am not a felon. This is not for commercial requests. This is not in

<div><div></div><div>Details</div></div>	
Submitted	Wed, Aug 20, 2025
Status	In Progress
Name of Requestor	Shore Investigates
Phone	<u>8567017919</u>
Email	<u>shoreinvestigates@gmail.com</u>
<div>1) I HAVE / HAVE NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States; I have not</div>	
<div>2) I, or another person, WILL / WILL NOT use the requested government records for a commercial purpose; I, or another person, will not</div>	



New Request



Track



Search

Record Request Information:

Please be as specific as possible in describing the records being requested. Also, please note that your preferred method of delivery will only be accommodated if the custodian has the technological means and the integrity of the records will not be jeopardized by such method of delivery.

Re: OPRA and common law request, security camera footage of the February 25, 2025 public Board of Education meeting Dear Records Custodian, Shore Investigates is a nonprofit investigative reporting project focused on government transparency and public accountability in South Jersey. Pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access, I request the following public records: Requested records 1. Security camera video that is directed at the Board of Education dais and captures the Board members reactions during the last thirty minutes of the February 25, 2025 public meeting of the Cherry Hill Board of Education. 2. If the above is burdensome, please instead provide only the approximately three minutes corresponding to my public comment during that meeting. Reference link The meeting is posted on YouTube at: https://youtu.be/_rER30gBO24?si=yKsZPNfhafnJ58so Format Please provide an electronic copy in MP4 or another common digital format, delivered by email or a downloadable link. If the file is large, a cloud link is acceptable. If the video contains audio, please include it. Narrow tailoring and redactions This request targets only cameras that show the Board dais and elected officials during the public, live streamed meeting. It does not seek footage of entrances, exits, camera placements, or other sensitive angles. If you believe any portion would reveal security sensitive details, please produce the video with narrowly tailored measures, for example cropping to the dais view, blurring non relevant areas, masking overlays that reveal camera identifiers, or producing only the three minute segment tied to my public comment. Please avoid withholding in full if partial disclosure is feasible, and provide a redaction log that identifies the legal basis and the nature of each redaction. OPRA compliance items - If you contend any exemption applies, please identify each exemption with specificity and provide a particularized explanation linked to the content being withheld. General statements about hypothetical



New Request



Track



Search

and explain why an electronic copy cannot be provided even though the record is a digital video. - Please advise of any special service charge in advance as required by OPRA. Common law right of access, statement of interest and purpose I seek this record to report on and inform the public about the Board's conduct during public comment at a public meeting. During my public comment, the livestreamed feed did not show the Board dais, leaving the public without any visual record of how elected officials received the remarks. The requested security camera view is the only recording that can complete the public record of that exchange so the community can witness, in full detail, the Board's demeanor during public comment. See N.J.S.A. 10:4-7, which provides, in relevant part, that "The Legislature finds and declares that the right of the public to be present at all meetings of public bodies, and to witness in full detail all phases of the deliberation, policy formulation, and decision making of public bodies, is vital to the enhancement and proper functioning of the democratic process." The public interest in disclosure is strong and the privacy interests are minimal. The footage sought depicts elected officials acting in their official capacity during a public meeting that was already open to the public and live streamed. I request the dais facing view precisely to avoid revealing non relevant areas. Any residual security concern can be addressed through the narrow tailoring described above. I am requesting this footage for newsgathering and public dissemination by Shore Investigates, not for commercial resale and not for use in litigation. Additional context supports disclosure. The District publicly releases videos that reveal building exteriors and interiors, and at times, images of security monitors. These publicly released materials are far more revealing than a tightly cropped dais angle for a few minutes during a public meeting. For these reasons, both OPRA and the common law right of access favor disclosure here, with any necessary and narrowly tailored redactions. Please confirm receipt of this request. OPRA requires a response within seven business days. If you need clarification, please contact me promptly so production is not delayed. If access is denied in whole or in part, please provide the reasons for the denial, the statutory citations relied upon, the custodian's name and signature, and instructions for appeal. Examples of my reporting can be found here: 1.

 New Request

 Track

 Search

courtroom-the-red-acura-road-rage-case-ends-with-a-guilty-plea-and-90-fine-3b/a319171618 I am not a felon. This is not for commercial requests. This is not in relation to a court proceeding. Thank you for your prompt attention. Sincerely, Ben Shore Chief Editor Shore Investigates <https://medium.com/@shoreinvestigates>

Does your request include electronic communications?

No

I request (*select one*):

Electronic Copies through the JustFOIA Public Portal

Requested Documents

File	Description	Size	Upload Date
No documents have been added			
Rows per page: 5 - < >			

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

ACCESSIBILITY

POWERED BY JUSTFOIA

EXHIBIT I

Request Information

Print Requested By: JasonSchimpf
Date Printed: 01/06/2026

Request Number: OPRA-2025-12
Date of Request: 08/28/2025 08:00 AM
Request Type: OPRA Records Request
Request Status: Complete
Public Request: No

Request Details

Request Fields

Name of Requestor Shore Investigates
Phone
Email Shoreinvestigates@gmail.com
Address
City
State
Zip

1) I *HAVE / HAVE NOT* been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States; I have not

2) I, or another person, *WILL / WILL NOT* use the requested government records for a commercial purpose; I, or another person, will not

3) I *AM / AM NOT* seeking records in connection with a legal proceeding. I am not

RE: August 27, 2025, OPRA and Common Law

Request: Bills and Monies Paid for L-594-25 Dear Records Custodian, Pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access, I request records that show the bills received and the monies paid by the District for the Superior Court matter docketed as L-594-25. Records required to be maintained by District policy Policy 0172, Duties of Treasurer of School Moneys: "Keep a record of monies received and paid out," and "Render a monthly report to the Board giving a detailed account of all receipts, the amounts of all warrants issued, the accounts from which they were drawn and the balance in each account." Policy 0174, Legal Services (M): "The Superintendent and Assistant Superintendent for Business/Board Secretary shall be responsible to review all legal bills," and "All requests for legal advice shall be made to the designated contact person(s) in writing and shall be maintained on file... [who] shall maintain a log of all legal counsel contact... [and] compare all legal bills to the contact logs and... resolve any variances." Policy 0173, Duties of Public School Accountant: "Each annual audit shall include an audit of the books, accounts and moneys, and verification of all cash and bank balances," and the recommendations are to be read and discussed at a public meeting. Requested records (from Jan 1, 2025 to Present): 1) Bills for L-594-25 Invoices or billing statements for L-594-25 from Jan. 1, 2025 to present. If you believe narrative descriptions contain privileged material, please use narrowly tailored redactions. 2) Monies paid for L-594-25 Records that show what was paid and when for those invoices, for example check register or warrant list entries, ACH confirmations, and accounts payable or general ledger detail that identify vendor, invoice number, payment date, amount, and account code. Please provide these payment records as a single spreadsheet export or CSV if available. 3) Litigation cost totals and any settlement or reimbursement payments for L-594-25 Any record that shows the total spend to date for L-594-25. If a settlement or judgment was paid, provide the page that shows the amount and payee along with the payment record. If any insurer or risk pool reimbursed the District, provide the reimbursement entry that shows the amount and date. Identification aid If your system tracks this matter under an internal

Record Request Information:
Please be as specific as possible in describing

the records being requested. Also, please note that your preferred method of delivery will only be accommodated if the custodian has the technological means and the integrity of the records will not be jeopardized by such method of delivery.

matter or project code rather than the docket number, please include that code so the responsive entries are clear. Format and existing records Invoices may be produced as PDFs. Payment records and accounting exports should be produced as native Excel or CSV with column headers. This request does not ask you to create a new record, please produce the records as they exist in the ordinary course of business as per board policy. If your system can readily export the responsive entries, that export is acceptable. Redactions Please segregate and release non exempt portions. Dollar amounts, dates, vendor names, hours, rates, and totals are not privileged. Attorney invoices should not be denied in their entirety; only privileged portions may be redacted. Please provide a brief log identifying the legal basis for any and all redactions. Common law statement of interest and purpose I seek these records to inform the public about the District's fiscal responsibility during the current election season. Voters have a direct interest in understanding how taxpayer funds are spent on litigation, including what was billed, what was paid, and whether any settlement or insurance reimbursement changed the net cost to the public. This is a noncommercial newsgathering request by Shore Investigates, and I intend to analyze and publish the results for the community. The request is narrowly tailored. It is limited to one docket number, L-594-25, and to a specific date range. It seeks existing fiscal and transactional records in the formats your office routinely uses. It does not seek litigation strategy or privileged legal advice. I agree to narrowly tailored redactions of narrative descriptions where privilege applies, while preserving non privileged fields such as dates, dollar amounts, vendors, hours, rates, subtotals, and totals. District policy requires the Treasurer to keep detailed monthly records of receipts, warrants, and balances, requires administration to review and maintain legal bills and related logs, and requires an annual audit of books, accounts, and monies. These requirements confirm that the requested invoices and payment records exist and are regularly maintained. The countervailing interests are minimal because the records concern spending of public funds to public vendors, not personal information. Any sensitive identifiers may be redacted. On balance, disclosure of these fiscal

records will advance public understanding of District spending, which is particularly important for voters during an election. Sincerely, Ben Shore Chief Editor, Shore Investigates Shoreinvestigates@gmail.com

Does your request include electronic communications?

No

I request (*select one*):

Electronic Copies through the JustFOIA Public Portal

Attachments

File	Size	Description
Shore Investigates OPRA Request 9.27.25.pdf	79.05 KB	

EXHIBIT J

On Mon, Sep 15, 2025 at 10:04 AM Schimpf, Jason <jschimpf@chclc.org> wrote:
Mr. Shore,

I have attached your requested documents related to OPRA 2025-12. Please note that the internal code for Docket L-594-25.

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

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Thursday, September 11, 2025 11:16 AM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Tackett, Deborah <DTackett@chclc.org>; opra@ericshore.com <opra@ericshore.com>; Morton, Kwame <kmorton@chclc.org>
Subject: Re: Cherry Hill Public Schools - OPRA Records Request OPRA-2025-12: Confirmation

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

Thanks for the update. Given the upcoming election, timely access is important. OPRA places invoices in the immediate access category.

I can agree to a partial production if, **by 5:00 PM today**, you provide the total dollars paid or obligated to outside counsel for the period in my request. A single total is sufficient today. No redactions or anything would be required and I assume you can easily obtain that number.

To meet in the middle on the remainder, I will accept the breakdown and copies of the invoices by Wednesday, September 17, and all other non-invoice categories by Friday, September 19.

I hope you understand the importance and time sensitivity with the upcoming election and the public's interest in where their tax dollars go.

Please advise.

Ben

On Thu, Sep 11, 2025 at 10:11 AM Schimpf, Jason <jschimpf@chclc.org> wrote:
 Ben,

We are actively working on retrieving the requested invoices from counsel as they are directly billed to our carrier. I will let you know when I receive and provide an updated timeline for delivery.

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

From: Ben Shore <shoreinvestigates@gmail.com>

Sent: Thursday, September 11, 2025 8:21 AM

To: Schimpf, Jason <jschimpf@chclc.org>

Cc: Tackett, Deborah <DTackett@chclc.org>; opra@ericshore.com <opra@ericshore.com>; Morton, Kwame <kmorton@chclc.org>

Subject: Re: Cherry Hill Public Schools - OPRA Records Request OPRA-2025-12: Confirmation

CAUTION: [EXTERNAL EMAIL]

Good morning, touching base on the below:

On Wed, Sep 10, 2025 at 8:05 AM Ben Shore <shoreinvestigates@gmail.com> wrote:

Dear Mr. Schimpf,

Thank you for your email regarding Request OPRA-2025-12. While I understand your position, I must respectfully object to the full extension until September 19. Given the heightened public interest in these records due to the upcoming election, timely access is particularly important.

In particular, OPRA expressly requires that bills be made available for immediate access pursuant to N.J.S.A. 47:1A-5(e). Accordingly, I request that all responsive bills be produced **no later than Thursday, September 11, 2025**, by 5:00 PM.

That said, I want to emphasize that I am striving to be reasonable. If additional time is needed for other categories of records, I am amenable to those being provided by September 19, provided the bills are produced first. This approach will both satisfy the statute and help ensure the public is not deprived of important information during this period of heightened interest.

Please let me know if this arrangement is workable. I appreciate your cooperation.

Sincerely,
Ben Shore
Shore Investigates

On Tue, Sep 9, 2025 at 4:18 PM Schimpf, Jason <jschimpf@chclc.org> wrote:

Mr. Shore,

Pursuant to N.J.S.A. 47:1A-5(i), I am respectfully requesting additional time to thoroughly review the records associated with your request.

I anticipate being able to obtain, review, and properly redact all responsive records by Friday, September 19, 2025. Please feel free to contact me if you have any questions regarding this extension.

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

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Tuesday, September 9, 2025 2:07 PM
To: Schimpf, Jason <jschimpf@chclc.org>; Tackett, Deborah <DTackett@chclc.org>
Cc: opra@ericshore.com <opra@ericshore.com>; Morton, Kwame <kmorton@chclc.org>
Subject: Fwd: Cherry Hill Public Schools - OPRA Records Request OPRA-2025-12: Confirmation

CAUTION: [EXTERNAL EMAIL]

Good afternoon,

This is a friendly reminder that this request is due today.

Thank you,
 Shore Investigates.

----- Forwarded message -----

From: **JustFOIA Notification** <CherryHillPublicSchools@request.justfoia.com>
Date: Wed, Aug 27, 2025 at 7:06 PM
Subject: Cherry Hill Public Schools - OPRA Records Request OPRA-2025-12: Confirmation
To: <Shoreinvestigates@gmail.com>

Dear Requestor,

Thank you for submitting an OPRA Records Request to Cherry Hill Public Schools on Thursday, August 28, 2025.

Your Request Reference Number is **Request Number: OPRA-2025-12** and your Security Key is **A0B83D61**.

Use this information to track the status of your request at any time and to receive responsive documents through the JustFOIA Public Portal at the link here:

<https://chclc.justfoia.com/publicportal/home/track>.

Please have both reference numbers available when communicating with our staff regarding your request.

Thank you,



Cherry Hill Public Schools
 45 Ranoldo Terrace
 Cherry Hill, NJ 08034
lshugars@chclc.org
 (856) 429 - 5600



EXHIBIT K

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Tuesday, September 16, 2025 6:13 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Tackett, Deborah <DTackett@chclc.org>; opra@ericshore.com <opra@ericshore.com>
Subject: OPRA and Common Law Request: Bills and Monies Paid for L-815-25

CAUTION: [EXTERNAL EMAIL]

Dear Mr. Schimpf,

Pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access, I request records that show the bills received and the monies paid by the District for the Superior Court matter docketed as L-815-25.

Bills are required to be provided with immediate access. N.J.S.A. 47:1A-5(e) (“Immediate access ordinarily shall be granted to budgets, bills, vouchers, contracts, including collective negotiations agreements and individual employment contracts, and public employee salary and overtime information.”).

The records requested are required to be maintained by law or in the course of their official business, notably:

Policy 0172, Duties of Treasurer of School Moneys: “Keep a record of monies received and paid out,” and “Render a monthly report to the Board giving a detailed account of all receipts, the amounts of all warrants issued, the accounts from which they were drawn and the balance in each account.”

Policy 0174, Legal Services (M): “The Superintendent and Assistant Superintendent for Business/Board Secretary shall be responsible to review all legal bills,” and “All requests for

legal advice shall be made to the designated contact person(s) in writing and shall be maintained on file... [who] shall maintain a log of all legal counsel contact... [and] compare all legal bills to the contact logs and... resolve any variances.”

Policy 0173, Duties of Public School Accountant: “Each annual audit shall include an audit of the books, accounts and moneys, and verification of all cash and bank balances,” and the recommendations are to be read and discussed at a public meeting.

Requested records (from Jan 1, 2025 to Present):

1) Bills for L-815-25

Invoices or billing statements for L-815-25 from Jan. 1, 2025 to present. If you believe narrative descriptions contain privileged material, please use narrowly tailored redactions.

2) Monies paid for L-815-25

Records that show what was paid and when for those invoices, for example check register or warrant list entries, ACH confirmations, and accounts payable or general ledger detail that identify vendor, invoice number, payment date, amount, and account code. Please provide these payment records as a single spreadsheet export or CSV if available.

3) Litigation cost totals and any settlement or reimbursement payments for L-815-25

Any record that shows the total spend to date for L-815-25. If a settlement or judgment was paid, provide the page that shows the amount and payee along with the payment record. If any insurer or risk pool reimbursed the District, provide the reimbursement entry that shows the amount and date.

Identification aid

If your system tracks this matter under an internal matter or project code rather than the docket number, please include that code so the responsive entries are clear.

Format and existing records

Invoices may be produced as PDFs. Payment records and accounting exports should be produced as native Excel or CSV with column headers. This request does not ask you to create a new record, please produce the records as they exist in the ordinary course of business as per board policy. If your system can readily export the responsive entries, that export is acceptable.

Redactions

Please segregate and release non exempt portions. Dollar amounts, dates, vendor names, hours, rates, and totals are not privileged. Attorney invoices should not be denied in their entirety; only privileged portions may be redacted. Please provide a brief log identifying the legal basis for any and all redactions. I have included a sample index for your convenience from the New Jersey Government Records Council.

Common law statement of interest and purpose

I seek these records to inform the public about the District's fiscal responsibility during the current election season. Voters have a direct interest in understanding how taxpayer funds are spent on litigation, including what was billed, what was paid, and whether any settlement or insurance reimbursement changed the net cost to the public. This is a noncommercial newsgathering request by Shore Investigates, and I intend to analyze and publish the results for the community.

The request is narrowly tailored. It is limited to one docket number, L-825-25, and to a specific date range. It seeks existing fiscal and transactional records in the formats your office routinely uses. It does not seek litigation strategy or privileged legal advice. I agree to narrowly tailored redactions of narrative descriptions where privilege applies, while preserving non privileged fields such as dates, dollar amounts, vendors, hours, rates, subtotals, and totals.

District policy requires the Treasurer to keep detailed monthly records of receipts, warrants, and balances, requires administration to review and maintain legal bills and related logs, and requires an annual audit of books, accounts, and monies. These requirements confirm that the requested invoices and payment records exist and are regularly maintained. The countervailing interests are minimal because the records concern spending of public funds to public vendors, not personal information. Any sensitive identifiers may be redacted. On balance, disclosure of these fiscal records will advance public understanding of District spending, which is particularly important for voters during an election.

Sincerely,

Ben Shore

Chief Editor, Shore Investigates

Shoreinvestigates@gmail.com

EXHIBIT L

On Oct 15, 2025, at 12:14 PM, Schimpf, Jason <jschimpf@chclc.org> wrote:

CAUTION: This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments .

Mr. Shore,

I don't believe it would be appropriate for you to contact our claims representative directly. We will continue to handle all legal communications through our attorney.

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

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Monday, October 13, 2025 2:31 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Tackett, Deborah <DTackett@chclc.org>; opra@ericshore.com <opra@ericshore.com>
Subject: Re: OPRA and Common Law Request: Insurance Policies Covering Legal Matters

CAUTION: [EXTERNAL EMAIL]

Hi Mr. Schimpf,

Who is the claims person you're working with at NJSIG? I want to include them in settlement offers. It appears based on the contract they should be at the table.

Thanks,
Ben

On Mon, Oct 13, 2025 at 10:50 AM Schimpf, Jason <jschimpf@chclc.org> wrote:
Mr. Shore,

As requested, I have attached the insurance policies and declaration pages for the coverage period of July 1, 2024 through June 30, 2025.

Please note that the documents for the current coverage period of July 1, 2025 through June 30, 2026, have not yet been provided to the District by the insurance providers. We have been informed that they are expected to be delivered during the month of November.

Please let me know if you have any questions or have trouble accessing the attached files.

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

(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Wednesday, September 17, 2025 9:43 AM
To: Schimpf, Jason <jschimpf@chclc.org>; Tackett, Deborah <DTackett@chclc.org>
Cc: opra@ericshore.com <opra@ericshore.com>
Subject: OPRA and Common Law Request: Insurance Policies Covering Legal Matters

CAUTION: [EXTERNAL EMAIL]

Dear Mr. Schimpf,

Pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access, I request copies of the District's insurance policies that provide coverage for legal matters, litigation defense, or reimbursement of legal expenses.

Specifically, I request:

1. Current insurance policies
 - Insurance policies in effect from January 1, 2025 to present that provide coverage for legal defense, litigation costs, settlements, or judgments.
 - This includes but is not limited to policies issued by the New Jersey Schools Insurance Group (NJSIG) or any other insurer or joint insurance fund.
2. Coverage schedules and declarations
 - The declarations page, coverage schedules, endorsements, and limits of coverage applicable to legal matters.
3. Records identifying insurer relationships
 - Any record showing the District's membership in NJSIG or other joint insurance funds, including participation agreements or membership confirmations.

Format and existing records

Please produce responsive policies and related records in PDF format. This request does not ask you to create a new record but to provide the policies and coverage documents as they exist in the ordinary course of business.

Redactions

Please segregate and release non-exempt portions. Policy limits, coverage terms, and participating insurer information are not privileged and must be released. If you believe redactions are necessary, please provide a brief log identifying the legal basis for each redaction.

Common law statement of interest and purpose

I seek these records to inform the public about the District's fiscal responsibility and insurance coverage for litigation expenses. Voters and taxpayers have a direct interest in understanding what insurance resources are available to offset litigation

costs. This is a noncommercial newsgathering request by Shore Investigates, and I intend to analyze and publish the results for the community.

The request is narrowly tailored. It is limited to insurance policies covering legal matters and is confined to the current policy period. Disclosure will advance the public's understanding of how the District protects taxpayer funds against litigation costs.

I am not a felon. I am not using this litigation.

Sincerely,
Ben Shore
Chief Editor, Shore Investigates
shoreinvestigates@gmail.com

EXHIBIT M



Ben Shore <shoreinvestigates@gmail.com>

OPRA and Common Law Request: Copies of OPRA Requests Submitted (Jan 1 – Mar 31, 2025)

Ben Shore <shoreinvestigates@gmail.com>

Wed, Sep 17, 2025 at 10:44 AM

To: "Schimpf, Jason" <jschimpf@chcic.org>, "Tackett, Deborah" <DTackett@chcic.org>, "Morton, Kwame" <kmorton@chcic.org>, "opra@ericshore.com" <opra@ericshore.com>

Good morning,

Pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access, I request the following records:

1. OPRA requests submitted to the District between January 1, 2025 and March 31, 2025.

Please provide copies of the requests as PDFs

If you believe portions of the requests must be redacted (for example, personal identifiers such as home addresses), please narrowly tailor the redactions and release all non-exempt portions.

Please also provide a brief log identifying the legal basis for each redaction.

Common law statement of interest and purpose:

I seek these records to inform the public about the District's handling of public records requests. This is a noncommercial newsgathering request by Shore Investigates, and I intend to analyze and publish the results for the community.

The request is limited in scope to a specific three-month period and to a defined category of records (submitted OPRA requests), making it narrowly tailored.

I am not a felon. This is not for litigation. This is not a commercial request.

Thanks,
Ben Shore
Chief Editor, Shore Investigates
shoreinvestigates@gmail.com

Christina Michelson

From: Schimpf, Jason <jschimpf@chclc.org>
Sent: Wednesday, October 1, 2025 4:34 PM
To: Ben Shore
Cc: Tackett, Deborah; opra@ericshore.com; Christina Michelson
Subject: Re: OPRA and Common Law Request: Bills and Monies Paid for L-815-25

CAUTION: This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments .

Ben,

Please consider our response as final.

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

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Tuesday, September 30, 2025 9:11 AM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Tackett, Deborah <DTackett@chclc.org>; opra@ericshore.com <opra@ericshore.com>
Subject: Re: OPRA and Common Law Request: Bills and Monies Paid for L-815-25

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

Thank you for your email. It appears that some of the redactions are covering availability to meet. Can you please confirm if this is your final response? I think there was more redacted than necessary. If I do not hear back from you, I will have no choice but to pursue action with the GRC which conducts in-camera reviews to ensure the redactions were proper.

Thanks,
Ben

On Mon, Sep 29, 2025 at 5:34 PM Schimpf, Jason <jschimpf@chclc.org> wrote:
Mr. Shore,

Please find attached the records associated with your request below dated September 16, 2025. The amount billed to date for this matter is \$5,400.50.

Jason Schimpf
Assistant Superintendent
Business Administrator/Board Secretary

Cherry Hill Public Schools
(856) 429-5600 x4328

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Tuesday, September 16, 2025 6:13 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Tackett, Deborah <DTackett@chclc.org>; opra@ericshore.com <opra@ericshore.com>
Subject: OPRA and Common Law Request: Bills and Monies Paid for L-815-25

CAUTION: [EXTERNAL EMAIL]

Dear Mr. Schimpf,

Pursuant to the Open Public Records Act, N.J.S.A. 47:1A-1 et seq., and the common law right of access, I request records that show the bills received and the monies paid by the District for the Superior Court matter docketed as L-815-25.

Bills are required to be provided with immediate access. N.J.S.A. 47:1A-5(e) (“Immediate access ordinarily shall be granted to budgets, bills, vouchers, contracts, including collective negotiations agreements and individual employment contracts, and public employee salary and overtime information.”).

The records requested are required to be maintained by law or in the course of their official business, notably:

Policy 0172, Duties of Treasurer of School Moneys: “Keep a record of monies received and paid out,” and “Render a monthly report to the Board giving a detailed account of all receipts, the amounts of all warrants issued, the accounts from which they were drawn and the balance in each account.”

Policy 0174, Legal Services (M): “The Superintendent and Assistant Superintendent for Business/Board Secretary shall be responsible to review all legal bills,” and “All requests for legal advice shall be made to the designated contact person(s) in writing and shall be maintained on file... [who] shall maintain a log of all legal counsel contact... [and] compare all legal bills to the contact logs and... resolve any variances.”

Policy 0173, Duties of Public School Accountant: “Each annual audit shall include an audit of the books, accounts and moneys, and verification of all cash and bank balances,” and the recommendations are to be read and discussed at a public meeting.

Requested records (from Jan 1, 2025 to Present):

1) Bills for L-815-25

Invoices or billing statements for L-815-25 from Jan. 1, 2025 to present. If you believe narrative descriptions contain privileged material, please use narrowly tailored redactions.

2) Monies paid for L-815-25

Records that show what was paid and when for those invoices, for example check register or warrant list entries, ACH confirmations, and accounts payable or general ledger detail that identify vendor, invoice number, payment date, amount, and account code. Please provide these payment records as a single spreadsheet export or CSV if available.

3) Litigation cost totals and any settlement or reimbursement payments for L-815-25

Any record that shows the total spend to date for L-815-25. If a settlement or judgment was paid, provide the page that shows the amount and payee along with the payment record. If any insurer or risk pool reimbursed the District, provide the reimbursement entry that shows the amount and date.

Identification aid

If your system tracks this matter under an internal matter or project code rather than the docket number, please include that code so the responsive entries are clear.

Format and existing records

Invoices may be produced as PDFs. Payment records and accounting exports should be produced as native Excel or CSV with column headers. This request does not ask you to create a new record, please produce the records as they exist in the ordinary course of business as per board policy. If your system can readily export the responsive entries, that export is acceptable.

Redactions

Please segregate and release non exempt portions. Dollar amounts, dates, vendor names, hours, rates, and totals are not privileged. Attorney invoices should not be denied in their entirety; only privileged portions may be redacted. Please provide a brief log identifying the legal basis for any and all redactions. I have included a sample index for your convenience from the New Jersey Government Records Council.

Common law statement of interest and purpose

I seek these records to inform the public about the District's fiscal responsibility during the current election season. Voters have a direct interest in understanding how taxpayer funds are spent on litigation, including what was billed, what was paid, and whether any settlement or insurance reimbursement changed the net cost to the public. This is a noncommercial newsgathering request by Shore Investigates, and I intend to analyze and publish the results for the community.

The request is narrowly tailored. It is limited to one docket number, L-825-25, and to a specific date range. It seeks existing fiscal and transactional records in the formats your office routinely uses. It does not seek litigation strategy or privileged legal advice. I agree to narrowly tailored redactions of narrative descriptions where privilege applies, while preserving non privileged fields such as dates, dollar amounts, vendors, hours, rates, subtotals, and totals.

District policy requires the Treasurer to keep detailed monthly records of receipts, warrants, and balances, requires administration to review and maintain legal bills and related logs, and requires an annual audit of books, accounts, and monies. These requirements confirm that the requested

invoices and payment records exist and are regularly maintained. The countervailing interests are minimal because the records concern spending of public funds to public vendors, not personal information. Any sensitive identifiers may be redacted. On balance, disclosure of these fiscal records will advance public understanding of District spending, which is particularly important for voters during an election.

Sincerely,

Ben Shore

Chief Editor, Shore Investigates

Shoreinvestigates@gmail.com

EXHIBIT O

From: Ben Shore <shoreinvestigates@gmail.com>

Sent: Wednesday, October 22, 2025 12:59 PM

To: Schimpf, Jason <jschimpf@chclc.org>

Subject: Re: OPRA Request Confirmation

CAUTION: [EXTERNAL EMAIL]

Thank you!

On Wed, Oct 22, 2025 at 12:53 PM Schimpf, Jason <jschimpf@chclc.org> wrote:
Confirmed.

Get [Outlook for iOS](#)

From: Ben Shore <shoreinvestigates@gmail.com>

Sent: Wednesday, October 22, 2025 12:37:21 PM

To: Schimpf, Jason <jschimpf@chclc.org>

Subject: Fwd: OPRA Request Confirmation

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

Can you please confirm the portal is sending you the OPRA requests? My email server is saying delivered but I wanted to double check with you.

Ben

----- Forwarded message -----

From: **Cherry Hill OPRA Portal** <noreply@request.chpsopra.com>

Date: Wed, Oct 22, 2025 at 12:27 PM

Subject: OPRA Request Confirmation

To: <shoreinvestigates@gmail.com>

OPRA Request Confirmation

✓ Your request has been successfully submitted!

Dear Ben Shore,

This confirms that your Open Public Records Act (OPRA) request has been successfully submitted to Cherry Hill Public Schools.

Request ID: f66186ff-d06b-4493-b2ad-53d5d9bac27b

Submission Date: 10/22/2025, 4:27:47 PM

Delivery Method: Email

What Happens Next?

- Cherry Hill Public Schools will review your request
- You will receive a response within seven (7) business days, unless the custodian lawfully requires an extension
- If additional time is needed, you will be notified within the initial 7-day period
- Records will be delivered via your chosen method: **Email**

If Your Request Is Denied

If your request is denied, you have the right to appeal the decision.

You can file an appeal with the New Jersey Government Records Council (GRC) or pursue relief in the Superior Court.

→ [File an appeal with the GRC](#)

OPRA Attorney Resources:

Donald M. Doherty, Esq.

125 Route 73 North, West Berlin, NJ 08091

📞 609.336.1297

✉ dmd@donalddoherty.com

No charge for OPRA or civil rights representation statewide.

CJ Griffin, Partner & Director

Stein Public Interest Center

📞 201.270.4930

✉ cgriffin@pashmanstein.com

Walter M. Luers, Partner

Cohn Lifland Pearlman Herrmann & Knopf LLP

✉ wml@njlawfirm.com

⚠ IMPORTANT: Do Not Resubmit

Your request has been successfully received and is being processed. **Please do not submit duplicate requests** as this may delay processing.

Records Requested:

(A) Legal bills from Paul Green re OPRA from September 1, 2025 to present.

This is an automated confirmation from the Cherry Hill OPRA Request Portal.

Created by Benjamin Shore
Committed to transparency and public access.
Visit CHPSOPRA.com

EXHIBIT P

From: Cherry Hill OPRA Portal <noreply@request.chpsopra.com>
Sent: Saturday, October 25, 2025 6:08 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Subject: OPRA Request - Daniel Shore - 896e249f-7062-455a-bcac-dfe6b0873357

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: 896e249f-7062-455a-bcac-dfe6b0873357

Oct 25, 2025, 6:08:35 PM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

OPRA requests submitted to the district from Jan. 15, 2023 - December 15, 2024.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Delivery by email to shoreinvestigates@gmail.com is preferred.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

COMMON LAW REASON:

News/media purposes

CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,

Daniel Shore

shoreinvestigates@gmail.com

This request was submitted via the Cherry Hill OPRA Request Portal, CHPSOPRA.com. Built by Benjamin Shore.

EXHIBIT Q



Outlook

Coordinating monthly access to CHPS legal invoices for a public transparency dashboard

From Ben Shore <shoreinvestigates@gmail.com>**Date** Tue 11/11/2025 1:07 PM**To** Schimpf, Jason <jschimpf@chclc.org>; Baratti, Nina <nbaratti@chclc.org>; Morton, Kwame <kmorton@chclc.org>

CAUTION: [EXTERNAL EMAIL]

Dear Cherry Hill Public Schools,

I am building a public dashboard that tracks CHPS legal spending so families and taxpayers can clearly see how district funds are used. The dashboard organizes matters by category, for example OPRA litigation and special education disputes, and presents information such as costs, records at issue, stay put orders, and other legal activity. My goal is to keep this information current, accurate, and easy to understand.

I want to work with you on a simple, least burdensome way to obtain and update the underlying records. Rather than filing frequent piecemeal requests, I would like to coordinate a monthly update that provides legal invoices and basic matter level details. I am flexible on format and delivery. If it reduces workload, I can accept a recurring export from your existing system, a shared folder with monthly invoice packets, or a summary report that includes the necessary fields.

What's the best way we can work together to minimize the burden while also allowing me to obtain the records I need?

Thanks,
Ben

EXHIBIT R

On Thu, Dec 4, 2025 at 11:09 AM Schimpf, Jason <jschimpf@chclc.org> wrote:

Mr. Shore,

Attached is the October legal invoice for SPSK, who has handled the CHPSOPRA dispute. This is all that exists at the moment. Redactions were made to comply with attorney-client privilege along with any personally identifiable information.

Jason Schimpf

Assistant Superintendent/Business Administrator/Board Secretary

Cherry Hill Public Schools

(856) 429-5600 x4328

From: Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Sent: Sunday, November 23, 2025 3:00 PM

To: Schimpf, Jason <jschimpf@chclc.org>

Subject: OPRA Request - [REF: 2A5389F31AE1] - Ben Shore

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: 2cac38bf-d82d-4fb3-80cc-4068ae0282a1

Nov 23, 2025, 2:51:22 PM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

1. (a) Legal Bills related to the creation of CHPSOPRA.com at present.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Please use the "Reply" button to deliver records via email.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

HOW TO RESPOND:

To communicate with the requester: Simply click "Reply" to this email. Your response will be securely forwarded to the requester while protecting their privacy.

Reply-To Address: request-2a5389f31ae1@chpsopra.com

Important: Always use the "Reply" button to ensure proper delivery. Do not use any contact information that may appear in the request content.

COMMON LAW REASON:

News media interest in how the district handles OPRA and how tax payer money gets spent. There was considerable discussion and lawyers involved when the creation of the CHPSOPRA portal went into place. I would like to see the legal spending.

CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,

Ben Shore



EXHIBIT S

From: Cherry Hill OPRA Portal <noreply@request.chpsopra.com>
Sent: Tuesday, December 2, 2025 12:34 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Subject: OPRA Request - [REF: 1E44CC4A4675] - Shore investigates

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: 5afaaa1c-3eb7-4d47-862f-ec273e2d9831

Dec 2, 2025, 12:32:49 PM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

1. Monies paid or associated with the Appeals reply filing to the motion to remand in L594 that was filed by the District on December 1, 2025. The case is Shore v Cherry Hill Public Schools. Invoices and bills associated with such.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Please use the "Reply" button to deliver records via email.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

HOW TO RESPOND:

To communicate with the requester: Simply click "Reply" to this email. Your response will be securely forwarded to the requester while protecting their privacy.

Reply-To Address: request-1e44cc4a4675@chpsopra.com

Important: Always use the "Reply" button to ensure proper delivery. Do not use any contact information that may appear in the request content.

COMMON LAW REASON:

News media interest in how our tax dollars are spent.

CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,
Shore investigates

This request was submitted via the Cherry Hill OPRA Request Portal, CHPSOPRA.com. Built by Benjamin Shore.

EXHIBIT T

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Thursday, January 1, 2026 6:45 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Cc: Tackett, Deborah <DTackett@chclc.org>; opra@ericshore.com <opra@ericshore.com>
Subject: OPRA and Common Law

CAUTION: [EXTERNAL EMAIL]

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) Copy of the available "different camera angle" video of the Cherry Hill Board of Education meeting held on February 25, 2025, specifically during public comment when I spoke and showing the Board meeting from that alternate viewpoint, as described by counsel for Cherry Hill Public Schools, Mr. Eric Harrison, Esq., when he stated to the Court: "it's a different camera angle than the one that is already available . . . this is a discussion of a camera angle . . . the meeting itself has been memorialized on video and is available to the world to see, we are talking about a different camera angle and that's it . . ." Please provide the alternate-angle that is "already available." Please note I have reviewed the YouTube video located at <https://www.youtube.com/watch?v=rER30gBO24> and as the District is aware and as explained in my pleadings, the video does not contain any video during my public comment. **Please provide a copy of the alternative angle that was represented to the Court as "already available."**

Common Law Reason:

I assert a common law right of access to the requested records. The records are public records created or maintained by a public agency. I have a legitimate interest as a journalist with Shore Investigates to obtain and analyze these materials to inform the public about government operations and accountability. I intend to review and publish the results for the benefit of the public.

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
Shoreinvestigates.com

EXHIBIT U

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

Jan 9, 2026

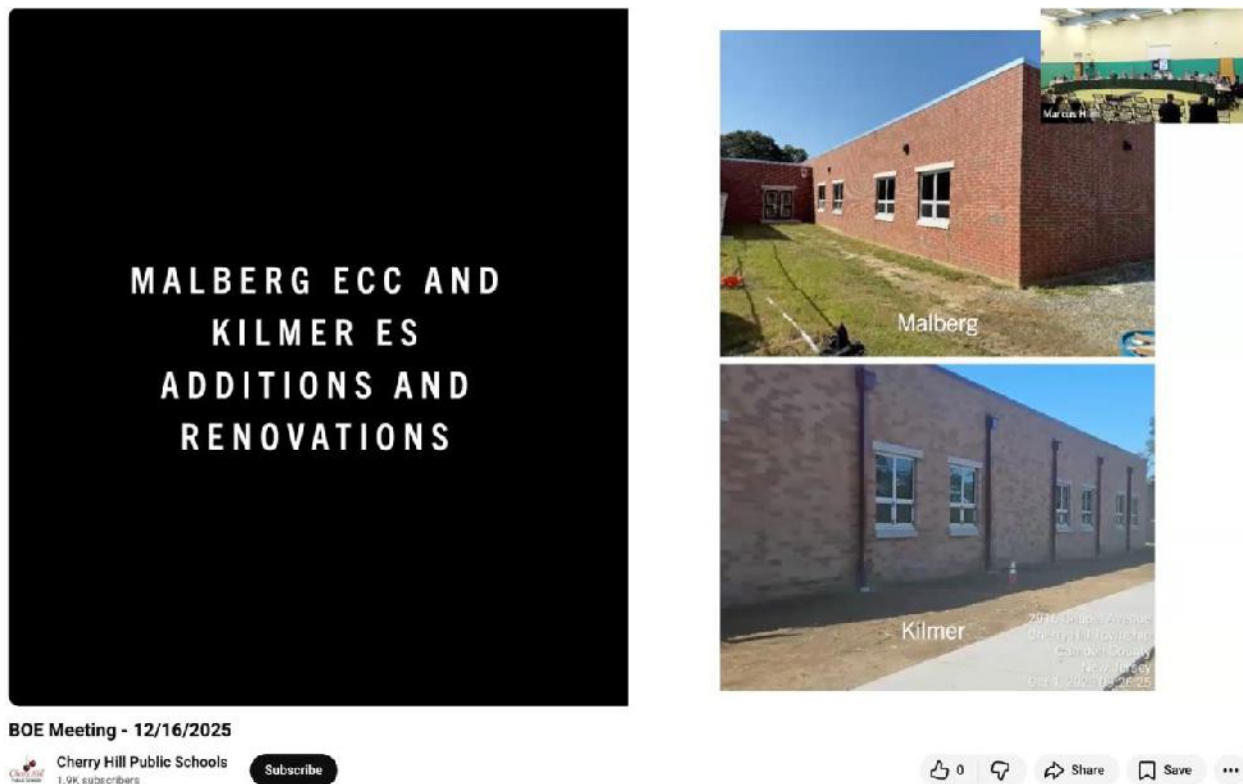
Dear Custodian of Records,

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

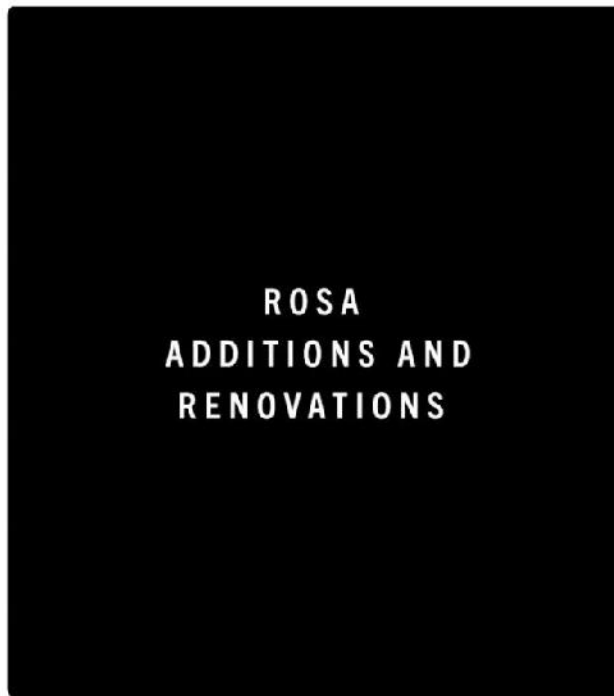
(a) Security Camera Footage from the Cherry Hill Township Board of Ed ("The Board") meeting held on 12/16/25. I am seeking footage of the meeting during the "Cherry Hill Tomorrow Project Update" including a reasonable buffer immediately before and after the presentation to ensure the full segment is 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



Cherry Hill Public Schools
1.9K subscribers

Subscribe

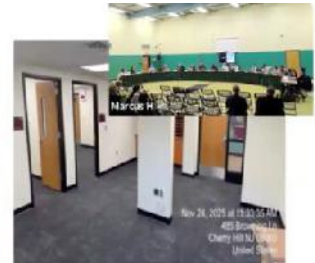
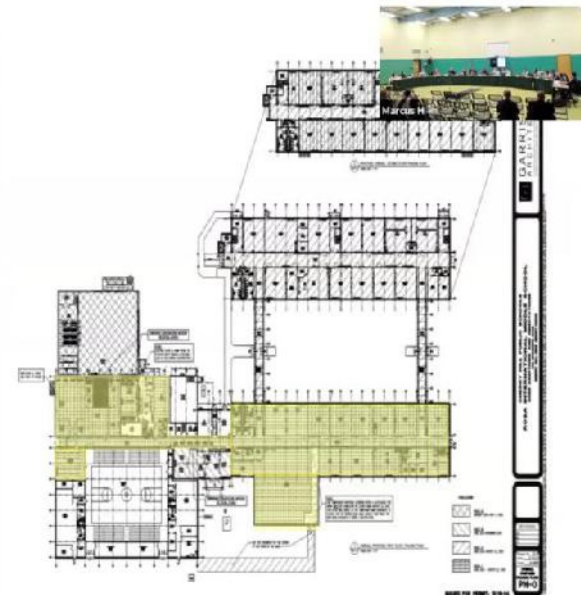


BOE Meeting - 12/16/2025



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

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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>

EXHIBIT V

Christina Michelson

From: Schimpf, Jason <jschimpf@chclc.org>
Sent: Wednesday, January 14, 2026 4:43 PM
To: Ben Shore
Cc: Eric Harrison; Christina Michelson; Paul H. Green; Katherine A. Gilfillan
Subject: Re: OPRA and Common Law Request

CAUTION: This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments .

Mr. Shore,

I have done nothing but work with you since I arrived in Cherry Hill. We can disagree on the interpretation of statue, 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

EXHIBIT W

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

EXHIBIT X



Cherry Hill Public Schools OPRA Request Portal

Request public records easily in just 4 simple steps. Our guided form makes accessing information fast, clear, and transparent.

For Cherry Hill parents, residents, and community members who need public records.



Submit an OPRA Request

This is a free, community created portal to assist with OPRA requests.



Easy step-by-step process



Takes just a few minutes



Get your records via email

Simple 4-Step Process

Our guided form breaks down the OPRA request into easy steps, so you always know what is needed

1

Your Info

Provide your contact details
(name optional)

2

Records Needed

Describe what records you are
requesting

3

Certifications

Answer required legal
questions for compliance

4

Review & Submit

Confirm details and send your
request

Ready to begin these steps now?



Submit an OPRA Request

EXHIBIT Y

Elementary Enrollment Balancing
Press Releases
School Start & End Times
Discussions with Dr. Morton
Notification of Rights Under FERPA
Notification of Rights under the Protection of Pupil Rights Amendment

Public Information

OPRA Requests

To submit an official Open Public Records Act (OPRA) request for Cherry Hill Public Schools, please use the link below.

[Submit an OPRA Request](#)

Public Information Office
Arthur Lewis Administration Building
45 Ranoldo Terrace
Cherry Hill, NJ 08034-0391
Phone: (856) 429-5600
[Directions](#)

Nina Baratti
Public Information Officer
nbaratti@chcl.org

New Jersey Government Records Council (“GRC”) What to do if your request for a record has been denied

The New Jersey Open Public Records Act (N.J.S.A. 47:1A-1 et seq.) permits a person who believes that he or she has been unlawfully denied access to a public record either to file a complaint with the GRC or to file suit in Superior Court to challenge the decision and compel disclosure. This poster describes the procedures



EXHIBIT Z



Outlook

Re: OPRA Request Confirmation

From Ben Shore <shoreinvestigates@gmail.com>**Date** Sat 10/25/2025 6:47 PM**To** Schimpf, Jason <jschimpf@chclc.org>**Cc** Tackett, Deborah <DTackett@chclc.org>; Katherine A. Gilfillan <kag@spsk.com>; Paul H. Green <PHG@spsk.com>; Morton, Kwame <kmorton@chclc.org>; Winters, Gina <ginawinters@chclc.org>; Greenbaum, Adam <adamgreenbaum@chclc.org>

CAUTION: [EXTERNAL EMAIL]

The District has received and filed 27 requests through the online portal OPRAMACHINE.com (https://opremachine.com/body/cherry_hill_board_of_education). But you claim “All OPRA requests must be submitted directly through the district's official channels to be properly processed.” That raises the question, If you will fulfil requests through their portal but not mine doesn't that seem like a bad faith denial of access? I would argue so.

On Sat, Oct 25, 2025 at 5:58 PM Ben Shore <shoreinvestigates@gmail.com> wrote:

Mr. Schimpf,

Thank you for your message. To avoid any confusion, CHPSOPRA.com is a private, unaffiliated website that I operate to help residents draft a written OPRA request and send it by email to the District's records custodian. At the bottom of every page it states, “This is a free, unofficial portal to assist with OPRA requests. Built by Benjamin Shore.” The same non affiliation language appears in the terms that users must agree to before submitting a request.

I asked the New Jersey Government Records Council to confirm that email requests generated by a third party site are valid under OPRA, and they agreed. In their written guidance, the GRC quoted N.J.S.A. 47:1A-5(f) and stated: “A completed form adopted by the custodian, a letter, or an email from a requestor including all of the information required on the adopted form shall suffice in place of a completed form as a valid government record request.” The GRC then explained, “The statute itself does not differentiate or other prohibit e-mails from a particular source. Thus, a plain reading of the statute indicates that an e-mail request conforming to the above should be treated as a valid OPRA request unless it falls within the conditions under which a custodian can deny same.”

While decisions rendered by the GRC are admittedly not binding they may be looked to for guidance. See *Renna v. County of Union*, 407 N.J. Super. 230, 237 (App. Div. 2009) (noting that “appropriate deference should be given to the GRC's Advisory Opinions since it is an administrative agency created under OPRA and is the agency charged with the enforcement of the statute”); *Paff v. City of East Orange*, 407 N.J. Super. 221, 228-29 (App. Div. 2009).

In light of the GRC's confirmation and the statute, my request submitted through the free CHPSOPRA.com portal is lawful and a valid OPRA request.

I am happy to continue this dialogue, but I do not intend to deactivate an unaffiliated tool that generates written emails to the custodian and makes clear that it is not authorized by the District.

I look forward to your anticipated cooperation with my lawfully filed OPRA request. (and those who choose to file through my electronic portal).

Thanks,
Ben

On Sat, Oct 25, 2025 at 4:36 PM Schimpf, Jason <jschimpf@chclc.org> wrote:

Mr. Shore,

It has come to our attention that you have created an electronic portal for submitting OPRA requests to the Cherry Hill Public School District. While we appreciate your interest in supporting community engagement, we would like to clarify that this portal is not affiliated with, endorsed by, or authorized by the Cherry Hill Board of Education. To ensure transparency, accuracy, and compliance with our internal procedures, we respectfully request that you deactivate the portal and refrain from accepting or forwarding OPRA requests on behalf of the district. All OPRA requests must be submitted directly through the district's official channels to be properly processed.

Thank you for your anticipated cooperation.

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

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Wednesday, October 22, 2025 2:36 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Subject: Re: OPRA Request Confirmation

CAUTION: [EXTERNAL EMAIL]

Is that ok?

On Wed, Oct 22, 2025 at 2:31 PM Ben Shore <shoreinvestigates@gmail.com> wrote:

Mr. Schimpf,

No, I built my own portal that sends it to you. JustFOIA has no option to submit a common law request and I don't like the functionality of it so I built what I think is a better portal. Check it out: www.CHPSOPRA.com

Thanks,
Ben

On Wed, Oct 22, 2025 at 2:09 PM Schimpf, Jason <jschimpf@chclc.org> wrote:

Ben,

Was this submitted through our JustFOIA portal? I received your email but did not see your requests in JustFOIA on our end.

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

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Wednesday, October 22, 2025 12:59 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Subject: Re: OPRA Request Confirmation

CAUTION: [EXTERNAL EMAIL]

Thank you!

On Wed, Oct 22, 2025 at 12:53 PM Schimpf, Jason <jschimpf@chclc.org> wrote:
Confirmed.

Get [Outlook for iOS](#)

From: Ben Shore <shoreinvestigates@gmail.com>
Sent: Wednesday, October 22, 2025 12:37:21 PM
To: Schimpf, Jason <jschimpf@chclc.org>
Subject: Fwd: OPRA Request Confirmation

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

Can you please confirm the portal is sending you the OPRA requests? My email server is saying delivered but I wanted to double check with you.

Ben

----- Forwarded message -----

From: **Cherry Hill OPRA Portal** <noreply@request.chpsopra.com>
Date: Wed, Oct 22, 2025 at 12:27 PM
Subject: OPRA Request Confirmation
To: <shoreinvestigates@gmail.com>

OPRA Request Confirmation

✓ Your request has been successfully submitted!

Dear Ben Shore,

This confirms that your Open Public Records Act (OPRA) request has been successfully submitted to Cherry Hill Public Schools.

Request ID: f66186ff-d06b-4493-b2ad-53d5d9bac27b

Submission Date: 10/22/2025, 4:27:47 PM

Delivery Method: Email

What Happens Next?

- Cherry Hill Public Schools will review your request
- You will receive a response within seven (7) business days, unless the custodian lawfully requires an extension
- If additional time is needed, you will be notified within the initial 7-day period
- Records will be delivered via your chosen method: **Email**

If Your Request Is Denied

If your request is denied, you have the right to appeal the decision.

You can file an appeal with the New Jersey Government Records Council (GRC) or pursue relief in the Superior Court.

→ [File an appeal with the GRC](#)

OPRA Attorney Resources:

Donald M. Doherty, Esq.

125 Route 73 North, West Berlin, NJ 08091

📞 609.336.1297

✉ dmd@donalddoherty.com

No charge for OPRA or civil rights representation statewide.

CJ Griffin, Partner & Director

Stein Public Interest Center

📞 201.270.4930

✉ cgriffin@pashmanstein.com

Walter M. Luers, Partner

Cohn Lifland Pearlman Herrmann & Knopf LLP

✉ wml@njlawfirm.com

IMPORTANT: Do Not Resubmit

Your request has been successfully received and is being processed. **Please do not submit duplicate requests** as this may delay processing.

Records Requested:

(A) Legal bills from Paul Green re OPRA from September 1, 2025 to present.

This is an automated confirmation from the Cherry Hill OPRA Request Portal.

Created by Benjamin Shore
Committed to transparency and public access.
Visit CHPSOPRA.com

EXHIBIT AA

**KATHERINE A. GILFILLAN***Admitted in NJ, NY & MA*

Direct Line: 973-631-7857

Email: kag@spsk.com

220 Park Avenue

PO Box 991

Florham Park, NJ 07932

Telephone: 973-539-1000

Fax: 973-540-7300

www.spsk.com

October 27, 2025

Via Email and Regular Mail (shoreinvestigates@gmail.com)

Benjamin Shore
 12 Manor House Court
 Cherry Hill, New Jersey 08003

CEASE AND DESIST

Dear Mr. Shore:

This firm represents the Cherry Hill Public Schools (hereinafter “the District”). It is well-established that the District owns a common law trademark for the mark “Cherry Hill Public Schools” through its continuous use of the name and operation as the only public school district in the Township of Cherry Hill since the Township was first established in November 1961. As a public agency in the State of New Jersey, the District is subject to the provisions of the Open Public Records Act, N.J.S.A. 47:1A-1 et seq. (“OPRA”), and maintains on its website a link to its official OPRA request form.

It has come to the District’s attention that you recently created a website with the domain name <https://chpsopra.com/> (“CHPSOPRA”) for the stated purpose of “assisting Cherry Hill residents with OPRA requests.” You have refused the Custodian’s directive to cease your use of this website name. It is obvious that your use of the name “Cherry Hill Public Schools” and associated images, in connection with a website containing a form to submit OPRA requests to the District can easily cause confusion to the public. A visitor to the website is greeted by a large heading that states, “Cherry Hill Public Schools OPRA Request Portal”, and the color scheme of your website seeks to mimic the look and feel of the District’s own website and its official OPRA request portal. Taken together, this will lead Cherry Hill community members to believe that they are submitting an OPRA request directly to the Cherry Hill Public Schools when, in fact, they are not. Moreover, your website leads to the reasonable conclusion that the services of CHPSOPRA are endorsed by, sponsored by, licensed by, or otherwise affiliated with the District and its trademark, all of which are untrue.

This strong likelihood of confusion exists despite your inclusion of so-called “legal disclaimer” language that is only accessible by navigating through various links or menus on the CHPSOPRA website, or by scrolling to the bottom of the website and reading fine print.



Benjamin Shore
October 27, 2025
Page 2 of 2

Your claim that email requests generated by a third-party website are valid under OPRA is wholly irrelevant to your use of the District's name and likeness. The salient fact is that by using the name and words "Cherry Hill Public Schools", along with a color scheme that mimics the look and feel of the District's website and official OPRA request form, your third-party website, as opposed to a website such as OPRAMachine.com, is likely to confuse community members.

You are hereby directed to immediately **cease and desist** from all use of the District's name and likeness and any matter similar to or representative of "Cherry Hill Public Schools" in any name, advertising, marketing, social media, or other content published in connection with your OPRA request form.

We request that you immediately acknowledge receipt of this letter and comply with these demands. The District reserves all rights to take further and other legal action, including a request for an injunction, if we do not hear back from you within three calendar days of the date on which this letter was sent and the website is not immediately removed.

Very truly yours,
SCHENCK, PRICE, SMITH & KING, LLP

Katherine A. Gilfillan

cc: Dr. Kwame Morton, Superintendent
Mr. Jason Schimpf, Business Administrator

EXHIBIT BB

----- Forwarded message -----

From: **Benjamin Shore** <benjyshore@gmail.com>

Date: Wed, Dec 3, 2025 at 1:43 PM

Subject: New options for cheap OPRA defense! OPRAPRO.com

To: <kmorton@chclc.org>, <ginawinters@chclc.org>, <adamgreenbaum@chclc.org>

Hi Dr. Morton,

I created OPRApro.com, the most advanced and affordable OPRA litigation tool. Whether you need a Paff Certification or a ready to go statement of information, OPRApro.com can get it done and the best part is it's approximately 1/100th the cost the District currently pay for OPRA defense.

Why pay Methfesell 3.1 hours to create a Vaughn Index when OPRApro.com can prepare it in under 30 seconds? Almost everything you get billed for, OPRApro can do at a tiny fraction of the cost.

If your interested in a demo let me know,

Ben

Sent from Gmail Mobile

EXHIBIT CC



Outlook

Fwd: New options for cheap OPRA defense! OPRAPRO.com

From Benjamin Shore <benjyshore@gmail.com>

Date Wed 12/3/2025 1:54 PM

To Schimpf, Jason <jschimpf@chclc.org>

CAUTION: [EXTERNAL EMAIL]

I'm sorry, I should've sent this your way. This will make your life much easier and can save the districts hundreds of thousands of dollars. OPRApro.com

Sent from Gmail Mobile

----- Forwarded message -----

From: **Benjamin Shore** <benjyshore@gmail.com>

Date: Wed, Dec 3, 2025 at 1:43 PM

Subject: New options for cheap OPRA defense! OPRAPRO.com

To: <kmorton@chclc.org>, <ginawinters@chclc.org>, <adamgreenbaum@chclc.org>

Hi Dr. Morton,

I created OPRApro.com, the most advanced and affordable OPRA litigation tool. Whether you need a Paff Certification or a ready to go statement of information, OPRApro.com can get it done and the best part is it's approximately 1/100th the cost the District currently pay for OPRA defense.

Why pay Methfesell 3.1 hours to create a Vaughn Index when OPRApro.com can prepare it in under 30 seconds? Almost everything you get billed for, OPRApro can do at a tiny fraction of the cost.

If your interested in a demo let me know,

Ben

Sent from Gmail Mobile

EXHIBIT DD



Outlook

Re: OPRA Request from [REDACTED] [REF: 71070D45B913] - Re: Your OPRA Request [REF: 71070D45B913] - Re: OPRA Request - [REF: 71070D45B913] - [REDACTED]

From Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Date Mon 1/5/2026 6:32 PM

To Schimpf, Jason <jschimpf@chclc.org>

CAUTION: [EXTERNAL EMAIL]

I'm sorry, I think I inquired using the wrong portal. I am looking for records from an incident reported to the police.

Sent from my iPhone

On Jan 5, 2026, at 6:20 PM, Cherry Hill OPRA Portal <noreply@request.chpsopra.com> wrote:

Hi,
Hello,

Can you please be more specific as to the records you are looking to receive?

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

From: Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Sent: Sunday, January 4, 2026 8:00 PM

To: Schimpf, Jason <jschimpf@chclc.org>

Subject: OPRA Request - [REF: 71070D45B913] - [REDACTED]

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: 239048b9-c174-443f-a280-7fod2e20bcf6

Jan 4, 2026, 7:59:47 PM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

[REDACTED]

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Please use the "Reply" button to deliver records via email.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

HOW TO RESPOND:

To communicate with the requester: Simply click "Reply" to this email. Your response will be securely forwarded to the requester while protecting their privacy.

Reply-To Address: request-71070d45b913@chpsopra.com

Important: Always use the "Reply" button to ensure proper delivery. Do not use any contact information that may appear in the request content.

COMMON LAW REASON:

I am the victim stated in this case along with my son against my father's son for domestic violence.

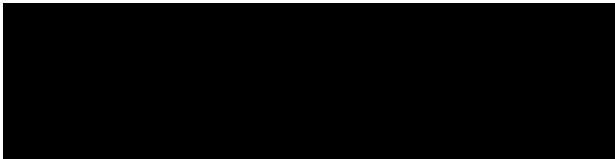
CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.



This request was submitted via the Cherry Hill OPRA Request Portal, CHPSOPRA.com. Built by Benjamin Shore.

EXHIBIT EE

✓ Your request has been successfully submitted!

Dear Ben Shore,

This confirms that your Open Public Records Act (OPRA) request has been successfully submitted to Cherry Hill Public Schools.

Request ID: f66186ff-d06b-4493-b2ad-53d5d9bac27b

Submission Date: 10/22/2025, 4:27:47 PM

Delivery Method: Email

What Happens Next?

- Cherry Hill Public Schools will review your request
- You will receive a response within seven (7) business days, unless the custodian lawfully requires an extension
- If additional time is needed, you will be notified within the initial 7-day period
- Records will be delivered via your chosen method: **Email**

If Your Request Is Denied

If your request is denied, you have the right to appeal the decision.

You can file an appeal with the New Jersey Government Records Council (GRC) or pursue relief in the Superior Court.

→ [File an appeal with the GRC](#)

OPRA Attorney Resources:

Donald M. Doherty, Esq.

125 Route 73 North, West Berlin, NJ 08091

📞 609.336.1297

✉ dmd@donalddoherty.com

No charge for OPRA or civil rights representation statewide.

CJ Griffin, Partner & Director

Stein Public Interest Center

📞 201.270.4930

✉ cgriffin@pashmanstein.com

Walter M. Luers, Partner

Cohn Lifland Pearlman Herrmann & Knopf LLP

✉ wml@njlawfirm.com

IMPORTANT: Do Not Resubmit

Your request has been successfully received and is being processed. **Please do not submit duplicate requests** as this may delay processing.

Records Requested:

(A) Legal bills from Paul Green re OPRA from September 1, 2025 to present.

This is an automated confirmation from the Cherry Hill OPRA Request Portal.

Created by Benjamin Shore
Committed to transparency and public access.
Visit CHPSOPRA.com

EXHIBIT B



BOE Meeting - What are your thoughts, comments, questions or concerns?

Please place your observations and concerns in the comments.



Newest ▾



Ben Shore ★ Rising contributor

For anyone who wants to look further into the budget and further understand where the money is going I encourage you to check out my free public tool that lets you make these requests for records for free to the District. www.chpsopra.com



www.chpsopra.com

chpsopra.com

57m Like Reply

Eric L. Harrison - ID #033381993
METHFESSEL & WERBEL, ESQS.
2025 Lincoln Hwy, Suite 200
Edison, NJ 08817
732-248-4200
732-248-2355
harrison@methwerb.com
Attorneys for Cherry Hill School District
Our File No. 97628 ELH

CHERRY HILL TOWNSHIP BOARD OF
EDUCATION,

Plaintiff,

V.

SHORE INVESTIGATES, LLC,
DANIEL SHORE, AND BENJAMIN
SHORE,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: CAMDEN COUNTY
DOCKET NO.: CAM-L-620-26

Civil Action

CERTIFICATION OF
JASON SCHIMPF

I, Jason Schimpf, of full age, duly certify as follows:

1. I am an Assistant Superintendent, Board Administrator, Board Secretary, and Custodian of Records for the Cherry Hill Township Board of Education ("Board").

2. I am fully familiar with the facts of the within matter.

3. I make this certification in support of the Board's opposition brief to the Defendants' Order to Show Cause.

4. I began serving as the Custodian of Records since August 2025 for the Board. I am responsible for responding to Open Public Records Act ("OPRA") requests in accordance with N.J.S.A. §47:1A-1, et seq.

5. The district staff has spent over 100 hours responding to OPRA requests from the Defendants.

6. The Board has received voluminous electronic correspondence from Benjamin Shore regarding his OPRA requests as well other non-OPRA requests for district information.

7. Since January 2025, Benjamin Shore has sent approximately 260 emails to district staff and administrators. The district staff has spent significant time reviewing and responding to these emails.

8. In addition, Benjamin Shore's website CHPSOPRA.com has caused great confusion for the public believing that it is administered by the Board.

9. On October 21, 2025, Benjamin Shore has submitted additional OPRA requests through his website seeking bills paid for FOIA matters and bid proposals. (Annexed hereto are true and accurate copy of the OPRA request submitted by Benjamin Shore dated October 21, 2025, as **Exhibit A**).

10. On October 22, 2025, Benjamin Shore submitted an OPRA request through his website seeking emails received by Jason Schimpf related to Benjamin Shore's website noreply@request.chpsopra.com. (Annexed hereto are true and accurate copy of the OPRA request submitted by Benjamin Shore dated October 22, 2025, as **Exhibit B**).

11. On November 11, 2025, Benjamin Shore submitted an OPRA request through his website seeking electronic communications between board members regarding his website. (Annexed hereto are true and accurate

copy of the OPRA request submitted by Benjamin Shore dated November 11, 2025 as **Exhibit C**).

12. On November 13, 2026, Benjamin Shore sent a duplicative OPRA request to the November 11th OPRA request. (Annexed hereto are true and accurate copy of the OPRA request submitted by Benjamin Shore dated November 13, 2025 as **Exhibit D**).

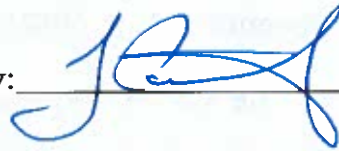
13. On October 26, 2025, Shore Investigates submitted an OPRA request through Benjamin Shore's portal seeking a spreadsheet of all current Cherry Hill public schools' police officers. (Annexed hereto are true and accurate copy of the OPRA request submitted by Shore Investigates dated October 26, 2025 as **Exhibit E**).

14. Over the past 6 months, the Board has received approximately 25 OPRA requests through his website and several were submitted by members of the public or filed anonymously.

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.

DATE:

By:



Jason Schimpf, Assistant Superintendent,
Board Administrator, Board Secretary, and
Custodian of Records, and Custodian of
Records for the Cherry Hill Board of
Education

EXHIBIT A



OPRA Request - Ben Shore - a652d6ee-f816-46ca-92ed-96553944b472

From Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Date Tue 10/21/2025 9:43 PM

To Schimpf, Jason <jschimpf@chclc.org>

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: a652d6ee-f816-46ca-92ed-96553944b472

10/22/2025, 1:43:39 AM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

(a) bills paid for the Districts just FOIA from 2024 to present. (b) bid proposals made for the FOIA software.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Delivery by email to shoreinvestigates@gmail.com is preferred.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

COMMON LAW REASON:

News/ Media

CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,

Ben Shore

shoreinvestigates@gmail.com

EXHIBIT B



OPRA Request - Ben Shore - d7a6c27e-db03-488f-8b50-56d1894694e2

From Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Date Wed 10/22/2025 8:28 PM

To Schimpf, Jason <jschimpf@chclc.org>

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: d7a6c27e-db03-488f-8b50-56d1894694e2

Oct 22, 2025, 8:28:40 PM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

All emails received by Jason Schimpf (Assistant Superintendent / Business Administrator / Board Secretary) from the address noreply@request.chpsopra.com, for the period October 19, 2025 through the present.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Delivery by email to shoreinvestigates@gmail.com is preferred.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

COMMON LAW REASON:

My interest is to understand and document how increased access to public records facilitates news reporting and public oversight, including how an online portal can improve transparency and district responsiveness.

CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,

Ben Shore

shoreinvestigates@gmail.com

EXHIBIT C



OPRA Request - [REF: 8B47E02A] - Ben Shore

From Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Date Tue 11/11/2025 10:05 AM

To Schimpf, Jason <jschimpf@chclc.org>

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: d8fcd7df-a19b-493e-873c-e349a740313b

Nov 11, 2025, 10:05:28 AM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

1. electronic communications between Cherry Hill Public Schools board vice president Adam Greenbaum and Andy McIlvaine regarding the CHPS OPRA portal I created from October 1, 2025 to present, including electronic communication made on his personal Facebook regarding official school business. Please also provide a Paff Certification.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Please use the "Reply" button to deliver records via email.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

HOW TO RESPOND:

To communicate with the requester: Simply click "Reply" to this email. Your response will be securely forwarded to the requester while protecting their privacy.

Reply-To Address: request-8b47e02a@chpsopra.com

Important: Always use the "Reply" button to ensure proper delivery. Do not use any contact information that may appear in the request content.

COMMON LAW REASON:

Board of Education members using personal Facebook accounts to talk about official school business so I'm interested.

CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,

Ben Shore

EXHIBIT D



Outlook

Re: OPRA Request from Ben Shore [REF: 8B47E02A] - Re: Your OPRA Request [REF: 8B47E02A] - Re: OPRA Request - [REF: 8B47E02A] - Ben Shore

From Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Date Thu 11/13/2025 4:28 PM

To Schimpf, Jason <jschimpf@chclc.org>

CAUTION: [EXTERNAL EMAIL]

Mr. Schimpf,

Thank you for your email. I confirm receipt.Â

Looks like the unique email links are working fine.Â

Ben

On Thu, Nov 13, 2025 at 4:15â€PM Cherry Hill OPRA Portal <noreply@request.chpsopra.com> wrote:
Mr. Shore,

Following a thorough search of our email records, we found no messages matching the criteria you outlined.Â Additionally, we have made inquiry of Mr. Greenbaum relative to your request for Facebook communications with Mr. McIlvaine concerning official Board business and have been advised that no such documents exist.Â Â

Accordingly, please accept this as certification that a thorough and reasonable search was performed and that no responsive records were located.Â Â

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

From: Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Sent: Tuesday, November 11, 2025 10:05 AM

To: Schimpf, Jason <jschimpf@chclc.org>

Subject: OPRA Request - [REF: 8B47E02A] - Ben Shore

Â

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: d8fcd7df-a19b-493e-873c-e349a740313b

Nov 11, 2025, 10:05:28 AM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

1. electronic communications between Cherry Hill Public Schools board vice president Adam Greenbaum and Andy McIlvaine regarding the CHPS OPRA portal I created from October 1, 2025 to present, including electronic communication made on his personal Facebook regarding official school business. Please also provide a Paff Certification.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Please use the "Reply" button to deliver records via email.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

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HOW TO RESPOND:

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Reply-To Address: request-8b47e02a@chpsopra.com

Important: Always use the "Reply" button to ensure proper delivery. Do not use any contact information that may appear in the request content.

COMMON LAW REASON:

Board of Education members using personal Facebook accounts to talk about official school business so I'm interested.

CERTIFICATIONS:

I certify that I have NOT been convicted of any indictable offense under the laws of New Jersey, any other state, or the United States.

I certify that these records will NOT be used for commercial purposes.

I certify that I am NOT seeking these records for use in any pending or anticipated legal proceeding.

Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,

Ben Shore

This request was submitted via the Cherry Hill OPRA Request Portal, CHPSOPRA.com. Built by Benjamin Shore.

EXHIBIT E



OPRA Request - [REF: 75118E40] - Shore Investigates

From Cherry Hill OPRA Portal <noreply@request.chpsopra.com>

Date Sun 10/26/2025 2:08 PM

To Schimpf, Jason <jschimpf@chclc.org>

CAUTION: [EXTERNAL EMAIL]

NEW OPRA REQUEST

Request ID: f93da07d-1911-41c6-8982-226ee3308015

Oct 26, 2025, 2:08:49 PM

Dear Custodian of Records,

This is a request for government records under **New Jersey's Open Public Records Act, N.J.S.A. 47:1A-1 to 47:1A-13**. In the alternative, and to the extent OPRA does not apply, treat this as a request under the common law right of access.

RECORDS REQUESTED:

1. Spreadsheet (Excel or CSV) listing all current members of the Cherry Hill Public Schools Police Department, including each officer's full name, title or rank, and employment status maintained at present.
2. All attorney invoices received or paid by the district for services rendered between September 1, 2025 and September 30, 2025. For each invoice, include the vendor name, invoice number, invoice date, matter/case name or description, hours, billing rate, amount, and any non-privileged narrative entries.

FORMAT AND DELIVERY:

Produce records electronically in their native or other machine-readable format, such as PDF, CSV, or XLSX. Please use the "Reply" button to deliver records via email.

RESPONSE TIME:

OPRA requires a response as soon as possible, but not later than **seven business days** after receipt. If any of the requested materials are subject to immediate access under N.J.S.A. 47:1A-5, such as budgets, bills, vouchers, contracts, or minutes, please provide those promptly.

FEES:

Electronic delivery should be provided without charge except for actual media cost when applicable. Do not incur any special service charge or other cost without first sending an itemized written estimate and receiving my approval.

REDACTIONS AND DENIALS:

If you withhold or redact any material, identify each record withheld or redacted, state the specific legal basis for each withholding or redaction with a citation to N.J.S.A. 47:1A-1 to 47:1A-13 or other law, and provide the non-exempt portions that can be reasonably segregated. If no responsive records exist, please provide a certification from the custodian confirming a diligent search and stating that no responsive records were found.

ROLLING PRODUCTION:

If some records can be produced sooner, please provide them on a rolling basis while you complete the remainder.

PREFERRED CONTACT:

Direct questions or requests to narrow this request to me in writing so there is a clear record of any clarification.

HOW TO RESPOND:

To communicate with the requester: Simply click "Reply" to this email. Your response will be securely forwarded to the requester while protecting their privacy.

Important: Always use the "Reply" button to ensure proper delivery. Do not use any contact information that may appear in the request content.

COMMON LAW REASON:

News/ Media interest

CERTIFICATIONS:

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Thank you for your prompt attention. Please confirm receipt and provide a tracking or reference number.

Sincerely,

Shore Investigates

