Pennsylvania
Office of Open Records

Pennsylvania Office of Open Records
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# FINAL DETERMINATION

DATE ISSUED AND MAILED: November 17, 2026

IN RE: *Stephen Ruzbacki v. Butler County* OOR Dkt. AP 2026-4611

Upon review of the appeal filed with the Office of Open Records ("OOR") to the above-referenced docket number, as well as the parties' submissions, the appeal is **DENIED** because:

**The Request is insufficiently specific.** Section 703 of the Right-to-Know Law requires that a request "identify or describe the record sought with sufficient specificity to enable which records are being requested." 65 P.S. § 67.703. In making this determination, we look to the nonexclusive, multifactor test employed by the Commonwealth Court in *Pa. Dep't of Educ. v. Pittsburgh Post-Gazette*, 119 A.3d 1121 (Pa. Commw. Ct. 2015), specifically: whether the request identifies a subject matter, a scope (i.e. the type of record or its recipients), and a timeframe. Here, the Request is incomplete, as the subject matter of the Request is in relation to an individual, and only a first name is provided. Based upon our application of the multifactor test, the Request is insufficiently specific, despite the Requester's assertions to the contrary, as the subject matter is incomplete and it would be impossible for the County to determine who the Requester was referencing without the full name of the individual identified in the Request.[1] Based upon our application of the multifactor test, the Request is insufficiently specific. The Requester is not prohibited from filing a new request that meets the requirements of 65 P.S. § 67.703.

For this reason, the County is not required to take any further action. Within thirty days of the mailing date of this Final Determination, either party may appeal or petition for review with the Butler County Court of Common Pleas. 65 P.S. § 67.1302(a). All parties must be served with notice of the appeal. The OOR also shall be served notice and have an opportunity to respond according to court rules as per 65 P.S. § 67.1303, but as the quasi-judicial tribunal adjudicating this matter, the OOR is not a proper party to any appeal and should not be named as a party.[2] All documents or communications following the issuance of this Final Determination shall be sent to oor-postfd@pa.gov. This Final Determination shall be placed on the website at: http://openrecords.pa.gov.

Issued by:

*/s/ Julie Sodl*

JULIE SODL, ESQ., APPEALS OFFICER

Sent via E-File Portal to: Stephen Ruzbacki, Matthew Vickless, AORO

[1] The Requester acknowledges his Request is incomplete, but asserts that portions of the Request are still sufficiently specific. However, the entire scope of the Request seeks records involving the individual who is not fully identified over a timeframe of approximately four and a half years.
[2] *Padgett v. Pa. State Police*, 73 A.3d 644, 648 n.5 (Pa. Commw. Ct. 2013).