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PROCUREMENT APPEALS

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DATE: Feb 13, 2019  
TIME: 3:18  AM  PM BY: FDJ  
FILE NO OPA-PA: 19-001

Attorneys for Interested Party  
Landscape Management Systems, Inc.

PROCUREMENT APPEAL  
IN THE OFFICE OF PUBLIC ACCOUNTABILITY

In the Appeal of	)	APPEAL NO. OPA-PA-19-001
	)	
JJ GLOBAL, INC.,	)	DECLARATION OF
	)	ROBERT P. SALAS
Appellant.	)	
_____	)	

I, ROBERT P. SALAS, declare that:

1. I am over 18 years of age, competent to testify and the matters set forth herein are based on my personal knowledge.
2. I am the president of Landscape Management Systems, Inc. ("LMS"). As such, I am familiar with the management and performance by LMS of its work under the Tumon Landscape Maintenance Contract (the "Contract") with the Guam Visitors Bureau ("GVB").
3. The scope of work under the Contract includes mowing and edging grass in road medians and shoulders, collecting trash, pruning and trimming trees along road medians and shoulders, and other landscaping work in Tumon.

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4. As a result of the award of that Contract from GVB, LMS has mobilized a number of employees and a significant amount of equipment to perform that work. In particular, approximately four full-time LMS employees are engaged in performing the work under the Contract, with support from numerous other LMS employees.

5. If the Contract work is enjoined, LMS would suffer greatly, as it would either have to continue to pay all those employees, even though there is now no such work for them, or lay them off. If LMS was forced to lay those employees off, it would be a great hardship for them, and it might be difficult for LMS to re-hire them if and when this procurement appeal is resolved.

6. Additionally, LMS has purchased certain specialized pieces of equipment, including a sweeper and a bucket-truck, which are used in performing the work under the Contract. If the work under the Contract is put on hold pending this appeal, that equipment may be rendered idle.

I declare under penalty of perjury of the laws of Guam that the foregoing is true and correct. Executed at Tumon, Guam on February 12<sup>th</sup>, 2019.



ROBERT P. SALAS