



Jerrick Hernandez <jhernandez@guamopa.com>

[eFile] OPA-PA-20-003: SH Enterprises, Inc.'s Exhibit List, Witness List, and List of Issues

Almin Manlucu <am@vlwilliamslaw.com>

Wed, Jan 27, 2021 at 4:32 PM

To: Jerrick Hernandez <jhernandez@guamopa.com>

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Håfa Adai Jerrick,

Please find the attached for filing in the above-referenced matter, as follows:

- SH Enterprises, Inc.'s Exhibit List
- SH Enterprises, Inc.'s Witness List
- SH Enterprises Inc.'s List of Issues

Kindly return a filed stamped copy through email.

Please let us know if you have any questions or concerns. Thank you for your attention to this matter.

Sincerely,

Almin Manlucu*Legal Assistant*

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3 attachments**2021.01.27 SH Enterprises, Inc.'s Witness List.pdf**

149K

**2021.01.27 SH List of Issues for 2.08.2021 Hearing.pdf**

146K

**2021.01.27 SH Enterprises, Inc.'s Exhibit List.pdf**

7820K

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*Attorney for Interested Party
SH Enterprises, Inc.*

**BEFORE THE PUBLIC AUDITOR
PROCUREMENT APPEALS**

IN THE APPEAL OF:)	APPEAL NO. OPA-PA-20-003
)	
BASIL FOOD INDUSTRIAL SERVICES CORPORATION,)	SH ENTERPRISES, INC.'S LIST OF ISSUES
)	
Appellant.)	

COMES NOW, Interested Party SH Enterprises, Inc. (“SH Enterprises”), by and through the undersigned counsel, hereby submits its List of Issues which to be determined at the February 8, 2021 hearing on this matter:

1. Whether the Public Auditor has authority to debar or suspend SH on a procurement appeal when the Public Auditor’s jurisdiction is limited to reviewing a decision to debar or suspend a contractor when properly submitted to it, and GSA did not issue such a decision.

2. Whether debarment or suspension proceedings before the Public Auditor denies SH the due process requirement of the Guam Procurement Law, Guam Procurement Regulations and the Administrative Adjudication Law.

3. Whether SH should be debarred or suspended when it received consideration of substantially equal or greater value than the use of its building, there was no relationship between the challenged procurement – GSA-056-019 – and the use of the building by the Governor’s office, and where debarment and suspension are not interest best interests of the government nor fair.

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1 Respectfully submitted this 27th day of January, 2021.

2 **LAW OFFICE OF VANESSA L. WILLIAMS, P.C.**
3 *Attorney for Interest Party*
4 *SH Enterprises, Inc.*

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6 VANESSA L. WILLIAMS, ESQ.

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