



Jerrick Hernandez <jhernandez@guamopa.com>

In the Appeal of Track Me Guam LLC; OPA-PA-21-002

Claire Pollard <cpollard@rwtguam.com>

Wed, Sep 1, 2021 at 2:57 PM

To: Jerrick Hernandez <jhernandez@guamopa.com>

Cc: "Edwin J. Torres" <etorres@rwtguam.com>, "Joshua D. Walsh" <jdwalsh@rwtguam.com>

Dear Mr. Hernandez:

Please see the following attached documents to be filed in the above-referenced matter:

- Appellant's List of Issues
- Appellant's Witness List
- Appellant's Exhibit List

A physical copy of the attached documents will be delivered to your office today. Should you have any questions or concerns, please feel free to contact our office. Thank you.

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Regards,
*Claire Pollard***RAZZANO WALSH & TORRES, P.C.**

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3 attachments**9.1.21 Appellant's List of Issues.pdf**

50K

**9.1.21 Appellant's Witness List.pdf**

43K

**9.1.21 Appellant's Exhibit List.pdf**

17596K

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IN THE OFFICE OF PUBLIC ACCOUNTABILITY

In the Appeal of

Track Me Guam, LLC

Appellant.

DOCKET NO. OPA-PA-21-002

APPELLANT'S LIST OF ISSUES

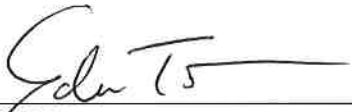
Appellant Track Me Guam, LLC (“TrackMe”), by and through its attorneys of record, Joshua D. Walsh and Edwin J. Torres, hereby submits the following list of issues to be determined during the hearing on this procurement matter:

1. Did the Guam Power Authority (GPA) substantially engage with the merits of TrackMe’s protest as required by Guam procurement law?
2. Did GPA violate Guam procurement law by allowing Pacifica, Inc. dba IT&E (“IT&E”) to answer the question of responsiveness by simply stating “comply” to all the specifications?
3. Did GPA violate Guam procurement law by allowing IT&E to supplement its bid response?
4. Is IT&E’s bid responsive to all specifications of the IFB?

5. Does IT&E's bid comply with specification C.1-17 of the IFB?
6. Does IT&E's bid comply with specification B.6 of the IFB?
7. Does IT&E's bid comply with specification C.1-13 of the IFB?
8. Does IT&E's bid comply with specification C.2 of the IFB?

Submitted this 1st day of September, 2021.

RAZZANO WALSH & TORRES, P.C.

By: 

JOSHUA D. WALSH
EDWIN J. TORRES
Attorneys for Appellant