



Jerrick Hernandez <jhernandez@guamopa.com>

In the Appeal of Guahan Ventures Inc. dba Turfco; OPA-PA-21-003

Claire Pollard <cpollard@rwtguam.com>

Fri, Sep 10, 2021 at 2:50 PM

To: Jerrick Hernandez <jhernandez@guamopa.com>

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

Dear Mr. Hernandez:

Please see the attached *Witness List, Exhibit List, and List of Issues*. to be filed in the above-referenced matter. A physical copy of the exhibits 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.

139 Murray Blvd. Ste. 100

Hagatna, Guam 96910

(T): 989-3009

(F): 989-8750

3 attachments



9.10.21 Appellant's List of Issues.pdf

48K



9.10.21 Appellant's Witness List.pdf

39K



9.10.21 Appellant's Exhibit List.pdf

8878K

RAZZANO WALSH & TORRES, P.C.

JOSHUA D. WALSH

EDWIN J. TORRES

SUITE 100, 139 MURRAY BLVD.

HAGÁTÑA, GUAM 96910

TELEPHONE: (671) 989-3009

FACSIMILE: (671) 989-8750

IN THE OFFICE OF PUBLIC ACCOUNTABILITY

In the Appeal of

Guahan Ventures Inc. dba Turfco,

Appellant.

DOCKET NO. OPA-PA-21-003

APPELLANT'S LIST OF ISSUES

Appellant Guahan Ventures Inc. ("Turfco"), by and through its attorney of record, Joshua D. Walsh, hereby submits the following list of issues to be determined during the hearing on this procurement matter:

1. Did the General Services Agency's (GSA) change to the Request for Quotation the evening before the bid quotations were due violate Guam Procurement Law?
2. Is the GSA's use of an "Emergency" to justify the late changes to the procurement unsupported by law or fact?
3. Did GSA's change to an "Immediate Delivery" requirement amount to a sole source Procurement in Violation of Guam Law?
4. Is GSA's Award of a purchase order to Guam Autospot void because of GSA's failure to inform all offerors equally of the procurement status?

5. Has GSA violated the Automatic Stay mandated by Guam procurement law?

Submitted this 10th day of September, 2021.

RAZZANO WALSH & TORRES, P.C.

By: 

JOSHUA D. WALSH
EDWIN J. TORRES
Attorneys for Appellant