



Jerrick Hernandez <jhernandez@guamopa.com>

In the Appeal of G4S Security Systems (Guam) Inc.; OPA-PA-21-007

Claire Pollard <cpollard@rwtguam.com>

Wed, Nov 24, 2021 at 3:30 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. Should you have any questions or concerns, please feel free to contact our office. Thank you.

--

Regards,
Claire Pollard

RAZZANO WALSH & TORRES, P.C.

139 Murray Blvd. Ste. 100

Hagatna, Guam 96910

(T): 989-3009

(F): 989-8750

3 attachments**11.24.21 PDS LIST OF ISSUES.pdf**

62K

**11.24.21 PDS EXHIBIT LIST.pdf**

42K

**11.24.21 PDS WITNESS LIST.pdf**

45K

RAZZANO WALSH & TORRES, P.C.

JOSHUA D. WALSH
EDWIN J. TORRES
139 MURRAY BLVD.
HAGATNA, GUAM 96910
TEL: (671) 989-3009
jdwalsh@rwtguam.com
etorres@rwtguam.com

Attorneys for Pacific Data Systems, Inc.

IN THE OFFICE OF PUBLIC ACCOUNTABILITY

In the Appeal of

DOCKET NO. OPA-PA-21-007

G4S Security Systems (Guam) Inc.,

**PACIFIC DATA SYSTEMS
LIST OF ISSUES**

Appellant.

Interested Party Pacific Data Systems (“PDS”), 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. Does GDOE Multi Step Invitation for Bid (“IFB”) 026-2021 for Indoor and Outdoor Wireless Local Area Network (“WLAN”) Infrastructure Installation Project issued on April 13, 2021, (the “IFB”) specify a scope of work that requires performance by a contractor properly licensed by the Guam Contractors Licensing Board?


//

//

2. Did the IFB, in specifying that an offeror comply with all applicable Guam licensing laws, require that an award can only be made to an offeror with a suitable Guam Contractor's license?
3. Did the Department of Education violate Guam procurement law to the extent that the IFB did not require that an offeror have a Guam Contractor's license?
4. Does Technologies for Tomorrow Inc. ("TFT") have a valid and suitable Guam Contractor's License?
5. Was TFT a responsive offeror under the IFB?
6. Was TFT a responsible offeror under the IFB?

Respectfully submitted this 24th day of November 2021.

RAZZANO WALSH & TORRES, P.C.

By: 
JOSHUA D. WALSH
EDWIN J. TORRES
Attorneys for Pacific Data Systems, Inc.