



Jerrick Hernandez <jhernandez@guamopa.com>

In the Appeal of G4S Security Systems (Guam), Inc.; Appeal No. OPA-PA-21-007

Tammy Reyes <treyes@calvofisher.com>

Wed, Nov 24, 2021 at 3:36 PM

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Dear Mr. Hernandez,

Please see attached submission of ***Appellant G4S Security Systems (Guam), Inc.'s List of Issues*** to be filed in the above-referenced action.

Please let me know whether you have any issues accessing the attachments. Thank you.

Regards,

Tammy L. Reyes

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 **Appellant G4S Guam's List of Issues.pdf**
12K

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12 **BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY**
13 **PROCUREMENT APPEALS**

14 In the Appeal of

15 G4S Security Systems (Guam), Inc.,

16 Appellant.

17 **Appeal No. OPA-PA-21-007**

18 **APPELLANT G4S SECURITY SYSTEMS**
19 **(GUAM), INC.'S LIST OF ISSUES**

1 **G4S SECURITY SYSTEMS (GUAM), INC.** (“Appellant” or “G4S”), respectfully
2 submits the following list of issues which require evidence or arguments to be presented at
3 Hearing:

- 4 1. Whether it is necessary to obtain a Contractors License and C68 Specialty License
5 from the Guam Contractors License Board (“GCLB”) to perform the work
6 required under Guam Department of Education (“GDOE”) Invitation for Bid 026-
7 2021 – Indoor and Outdoor Wireless Local Area (“WLAN”) Infrastructure
8 Installation Project (the “IFB”).
- 9 2. Whether the terms of the IFB required bidders to hold a valid Contractors License
10 and C68 Specialty License, or any other specialty licenses, from the GCLB.
- 11 3. Whether GDOE properly considered Technologies for Tomorrow Inc. (“TFT”) a
12 responsible and responsive bidder on the IFB despite TFT not holding certain
13 licenses necessary to perform the work under the IFB, including but not limited to,
14 a valid Contractors License or C68 Specialty License from the GCLB or a valid
15 business license from the Department of Revenue and Taxation.

16 Appellant reserves the right to amend or supplement this List of Issues.

17 Respectfully submitted this 24th day of November, 2021.

18 **CALVO FISHER & JACOB LLP**
19 *Attorneys for Appellant*
20 *G4S Security Systems (Guam), Inc.*

21 By: 
22 **GENEVIEVE P. RAPADAS**