



Jerrick Hernandez <jhernandez@guamopa.com>

GDOE Witness List and Exhibit List, Exhibits and List of Issues re: Appeal Case No. OPA-PA-21-007

Abmer T. Brennan <atbrennan@gdoe.net>

Wed, Nov 24, 2021 at 4:32 PM

To: Jerrick Hernandez <jhernandez@guamopa.com>, vduenas@guamopa.com, Thyrza Bagana <tbagana@guamopa.com>, "Joshua D. Walsh" <jdwalsh@rwtguam.com>, Claire Pollard <cpollard@rwtguam.com>, "Genevieve P. Rapadas" <grapadas@calvofisher.com>, Rodney Jacob <rjacob@calvofisher.com>, treyes@calvofisher.com, Teresa Sakazaki <teresa.sakazaki@gu.g4s.com>

Cc: "James L.G. Stake" <jlgstake@gdoe.net>, Legal Admin <legal-admin@gdoe.net>

Hafa Adai All,

Please see attached GDOE's Witness List and Exhibit List, Exhibits and List of Issues re: Appeal Case No. OPA-PA-21-007.

Kindly confirm receipt.

Thank you and stay safe.

Respectfully,

Abi T. Brennan

Office of the Superintendent, **Legal Div.**
Guam Department of Education

 [GDOE Exhibits OPA-PA-21-007.pdf](#)

Guam Department of Education

2 attachments

 **GDOE Witness and Exhibit List OPA-PA-21-004 007 11242021.pdf**
27K

 **GDOE List of Issues OPA-PA-21-007 11242021.pdf**
24K

1 **GUAM DEPARTMENT OF EDUCATION**

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7 *Attorney for Guam Department of Education*

8 **OFFICE OF THE PUBLIC AUDITOR**
9 **PROCUREMENT APPEALS**

10 In the Appeal of

11 APPEAL CASE NOS.: OPA-PA-21-007

12 G4S Security Systems (Guam), Inc.,

13 **PURCHASING AGENCY**
14 **GUAM DEPARTMENT OF EDUCATION**
15 **WITNESS LIST AND EXHIBIT LIST**

16 Appellant.

17
18 COMES NOW, the GUAM DEPARTMENT OF EDUCATION (GDOE), the purchasing
19 agency in this protest appeal, and hereby files its Witness List and Exhibit List.
20

21 **WITNESS LIST**

- 22 1. Carmen Charfauros, Supply Management Administrator,
23 Guam Department of Education
24 2. Vincent Dela Cruz, Data Processing Manager, Guam Department of Education
25 3. Daniel Coco, Vice President Asia Pacific, Technologies for Tomorrow Inc. (TFT)

26 GDOE reserves the right to not call the witnesses above, the right to call any witnesses
27 designated by the Appellant, the right to call witnesses as required for impeachment or rebuttal
28 regarding testimony of any witness, and the right to supplement this witness list.

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EXHIBIT LIST

- A. GDOE IFB 026-2021 and Amendments (hereafter referred to as “IFB”), pp. 2-253
- B. Bid Status, p. 255
- C. TFT Revised Bid Form 1, p. 257

GDOE reserves the right to amend or supplement this Exhibit List in order to identify any additional relevant evidence or documents that may be used in its defense or in rebuttal, including any documents contained in the Procurement Records, Agency Reports, or any other evidence or documents before the Public Auditor. GDOE also reserves the right to question and use any evidence or documents identified by the Appellant.

Respectfully submitted this 24th day of November, 2021.

GUAM DEPARTMENT OF EDUCATION

By: 
JAMES L.G. STAKE
Legal Counsel