

Suite 401 DNA Building  
 238 Archbishop Flores St.  
 Hagåtña, Guam 96910



# TRANSMITTAL

<b>To:</b>	<b>Mr. John M. Quinata</b> <b>Executive Manager</b> Guam International Airport Authority P.O. Box 8770 Tamuning, Guam 96931 Phone: (671) 646-0300 Fax: (671) 646-8823 Email: <a href="mailto:john.quinata@guamaiport.net">john.quinata@guamaiport.net</a>	<b>From:</b>	<b>Benjamin J.F. Cruz</b> <b>Public Auditor</b> Office of Public Accountability
	<b>Mr. William B. Brennan, Esq.</b> <b>Attorney for Guam International Airport Authority</b> Arriola Law Firm 259, Martyr Street, Suite 201 Hagåtña, Guam 96910 Phone: (671) 477-9730/33 Fax: (671) 477-9734 Email: <a href="mailto:attorneys@arriolafirm.com">attorneys@arriolafirm.com</a>	<b>Pages:</b>	14 (including cover page)
<b>CC:</b>	<b>Mr. R. Marsil Johnson, Esq.</b> <b>Ms. Isa B. Baza, Esq.</b> <b>Attorney for Appellant Pacific Federal Management, Inc.</b> Blair Sterling Johnson & Martinez A Professional Corporation 1411 Pale San Vitores Road, Suite 303 Tamuning, Guam 96913-4232 Phone: (671) 477-7857 Fax: (671) 472-4290 Email: <a href="mailto:rmarsjohnson@bsjmlaw.com">rmarsjohnson@bsjmlaw.com</a> ; <a href="mailto:ibbaza@bsjmlaw.com">ibbaza@bsjmlaw.com</a>	<b>Date:</b>	October 30, 2024
		<b>Phone:</b> <b>Fax:</b>	(671) 475-0390 x. 204 (671) 472-7951

**Re:** OPA-PA-24-005 Notice of Receipt of Appeal

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Thank you,  
 Jerrick Hernandez, Auditor  
[jhernandez@guamopa.com](mailto:jhernandez@guamopa.com)



## OFFICE OF PUBLIC ACCOUNTABILITY

Suite 401 Pacific News Building, 238 Archbishop Flores St., Hagåtña, Guam 96910

Phone: (671) 475-0390 / FAX: (671) 472-7951

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October 30, 2024

Mr. John M. Quinata  
Executive Manager  
Guam International Airport Authority  
P.O. Box 8770  
Tamuning, Guam 96931

**VIA EMAIL: [john.quinata@guamairport.net](mailto:john.quinata@guamairport.net)**

Re: Notice of Receipt of Appeal – OPA-PA-24-005

Dear Mr. Quinata,

Please be advised that Pacific Federal Management, Inc. (hereinafter referred to as “PFM”) filed an appeal with the Office of Public Accountability (OPA) on October 29, 2024, regarding the Guam International Airport Authority’s (GIAA)’s denial of its protest decision related to the procurement for Terminal Building Roof Replacement and Renewable Energy System – Phase I (Invitation for Bid No. GIAA-C07-FY24, Project No. GIAA-FY22-02-1, AIP No. 3-66-0001-TBD). OPA has assigned this appeal case number OPA-PA-24-005.

Immediate action is required of GIAA pursuant to the Rules of Procedure for Procurement Appeals, found in Chapter 12 of the Guam Administrative Regulations (GAR). Copies of the rules, the appeal, and all filing deadlines are available at OPA’s office and on its website at [www.opaguam.org](http://www.opaguam.org). The first eleven pages of the notice of appeal filed with OPA is enclosed for your reference.

Please provide the required notice of this appeal to the relative parties with instructions that they should communicate directly with OPA regarding the appeal. You are also responsible for giving notice to the Attorney General or other legal counsel for your agency. Promptly provide OPA with the identities and addresses of interested parties and a formal entry of appearance by your legal counsel.

Pursuant to 2 GAR, Div. 4, Ch. 12, §12104(3), the submission of one complete copy of the procurement record for the procurement solicitation above, as outlined in Title 5, Chapter 5, §5249 of the Guam Code Annotated is required no later than **Thursday, November 7, 2024**, five work days following this Notice of Receipt of Appeal. We also request one copy of the Agency Report for each of the procurement solicitations cited above, as outlined in 2 GAR, Div. 4, Chap. 12, §12105, by **Friday, November 15, 2024**, ten work days following receipt of this notice.

When filing all required documents with our office, please provide one original and one copy to OPA (**electronic filings will be acceptable and highly encouraged, and can be emailed to [jhernandez@guamopa.com](mailto:jhernandez@guamopa.com)**), and serve a copy to PFM.

Thank you for your prompt attention to this matter. Please contact Jerrick Hernandez at [jhernandez@guamopa.com](mailto:jhernandez@guamopa.com) or 475-0390 ext. 204 should you have any questions regarding this notice.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Benjamin J.F. Cruz', with a stylized flourish at the end.

Benjamin J.F. Cruz  
Public Auditor

Enclosure: First Eleven pages of the Notice of Appeal – OPA-PA-24-005

Cc: R. Marsil Johnson, Esq. and Isa B. Baza, Esq., Attorneys for PFM

1 R. MARSIL JOHNSON  
2 ISA B. BAZA  
3 BLAIR STERLING JOHNSON & MARTINEZ  
4 A PROFESSIONAL CORPORATION  
5 1411 PALE SAN VITORES ROAD, SUITE 303  
6 TAMUNING, GUAM 96913-4232  
7 TELEPHONE: (671) 477-7857

8 *Attorneys for Appellant Pacific Federal Management, Inc.*

9 **IN THE OFFICE OF PUBLIC ACCOUNTABILITY**  
10 **PROCUREMENT APPEAL**

11 **PART I**

12 **In the Appeal of** ) **Docket No. OPA PA-\_\_\_\_\_**  
13 )  
14 **PACIFIC FEDERAL MANAGEMENT,** )  
15 **INC.,** ) **NOTICE OF PROCUREMENT**  
16 ) **APPEAL**  
17 **Appellant.** )

18 **COMES NOW**, Pacific Federal Management, Inc. (“PFM”) and, through undersigned  
19 counsel, gives notice of its appeal from the Guam International Airport Authority (“GIAA”) denial  
20 of its procurement protest.

21 **PART II - APPELLANT INFORMATION**

22 Appellant’s Name: Pacific Federal Management, Inc.

23 Appellant’s Mailing Address: 202 Hilton Road, Unit 7  
24 Tumon, Guam 96913

25 Appellant’s Business Address: 202 Hilton Road, Unit 7  
26 Tumon, Guam 96913

27 Appellant’s Telephone Number: (671) 989-8542

28 Appellant is represented by legal counsel. Please direct all correspondence to:

1 Counsel's Names: R. Marsil Johnson  
 2 Isa B. Baza  
 Blair Sterling Johnson & Martinez, P.C.  
 3  
 4 Counsel's Mailing Address: 1411 Pale San Vitores Road, Suite 303  
 Tamuning, Guam 96913  
 5  
 6 Counsel's Telephone Number: (671) 477-7857  
 7  
 8 Counsel's Email Addresses: rmarsjohnson@bsjmlaw.com  
 ibbaza@bsjmlaw.com

9 **PART III - APPEAL INFORMATION**

- 10 A) Purchasing Agency: Guam International Airport Authority ("GIAA")  
 11 B) Identification/Number of Procurement, Solicitation, or Contract: Invitation for Bid No.  
 GIAA-C07-FY24, Project No. GIAA-FY22-02-1, AIP No. 3-66-0001-TBD (the "IFB").  
 12  
 13 C) Decision being appealed was made on October 14, 2024 by John M. Quinata, GIAA's  
 Executive Manager. He is the Head of the Purchasing Agency.  
 14  
 15 D) Appeal is made from a Decision on Protest of Method, Solicitation or Award.  
 16 E) Names of Competing Bidders, Offerors, or Contractors known to Appellant:  
 17 1. Core Tech International Corporation  
 18 2. Green Community Development *dba* Surface Solutions

19 **PART IV - STATEMENT OF GROUNDS FOR APPEAL**

20 **A. GROUNDS FOR APPEAL**

21 **1. RELEVANT PROCEDURAL AND FACTUAL HISTORY**

22 On May 22, 2024, GIAA issued the IFB, concerning the bid for the Terminal Building  
 23 Roof Replacement and Renewable Energy System – Phase I at GIAA (the "Solicitation").  
 24

25 Three bids were submitted:

<b>Bidder</b>	<b>Total Bid Amount</b>
Green Community Development dba Surface Solutions	\$7,898,800.00
Pacific Federal Management, Inc.	\$15,922,865.41
Core Tech International Corporation	\$20,068,296.00

1 Notably, Core Tech International Corporation’s bid was nearly three times the amount of  
2 the lowest bid. It was also only \$55,869.00 less than the \$20,124,165.00 government estimate for  
3 the project.

4  
5 On August 19, 2024 PFM was informed its bid was nonresponsive because it failed to  
6 submit and did not hold all required contractor license classifications required by the Solicitation.  
7 *See* Exhibit “1” (“Bid Status” Letter).

8 PFM filed a procurement protest with GIAA on August 29, 2024. *See* Exhibit “2” (PFM  
9 Protest).

10  
11 On October 14, 2025, GIAA Executive Director John Quinata issued a letter to PFM  
12 denying its procurement protest, leading to the instant appeal. *See* Exhibit “3” (Denial of  
13 Procurement Protest).

14  
15 **2. TIMELINESS OF PROTEST AND APPEAL**

16 Title 5 GCA § 5425(a) requires that protests must be made within fourteen days of the  
17 issues leading to the protest being known by the protestor.

18 PFM learned the reason why GIAA deemed it a nonresponsive bidder on August 19, 2024.  
19 GIAA held that PFM “failed to submit and does not hold all required Contractor’s License  
20 classifications.”  
21

22 PFM filed its protest on August 29, 2024, which is less than fourteen days after August 19,  
23 2024. Therefore, PFM’s procurement protest was timely.

24  
25 **3. PFM DID HOLD AND SHOW IT HELD ALL REQUIRED LICENSES BY SHOWING  
PROOF THAT IT HELD AN “A LICENSE” AND A “B LICENSE”**

- 26 a. **ALL “A LICENSE” HOLDERS AUTOMATICALLY HOLD LICENSES IN “B  
27 LICENSE CATEGORIES” AND “C LICENSE CATEGORIES” PURSUANT TO 25  
GAR CH. 12 § 12107(a)(4).**

28 Under the CLB rules:

1 Title 25 GAR Ch. 12 § 12106(a)(1) governs the General Engineering Contractor (“A  
2 License”) category. Importantly, the list contained in 25 GAR Ch. 12 § 12106(a)(1) includes  
3 “Classified Specialties” as one of the trades or crafts General Engineering Contractors (“A  
4 License”) are allowed to perform.  
5

6 Title 25 GAR Ch. 12 § 12106(a)(2) governs the General Building Contractor (“B License”)  
7 category.  
8

9 Title 25 GAR Ch. 12 § 12106(a)(3) governs the General Engineering Contractor (“C  
10 License”) subclassifications.  
11

12 Title 25 GAR Ch. 12 § 12106(a) encompasses all three license categories.

13 The Solicitation required all bidders to hold the following CLB licenses: A, B, C-8, C-13,  
14 C-33, C-37, C-41, C-42, C-48, C-51, C-55 and C-56. The following table contains a list of the “C  
15 License” subclassifications required by the IFB and the titles for each subclassification:  
16

17 **“Table A”**

18 “C License” Subclassification Number	19 “C License” Subclassification Title
20 C-8	Cement Concrete Contractor
21 C-13	Electrical Contractor
22 C-33	Painting and Decorating Contractor
23 C-37	Plumbing Contractor
24 C-41	Reinforcing Steel Contractors
25 C-42	Roofing Contractor
26 C-48	Structural Steel Contractor
27 C-51	Warm Air Heating, Ventilating and Air Conditioning Contractor
28 C-55	Waterproofing Contractor
C-56	Welding Contractor

29 PFM holds an “A license” and a “B License.” Therefore, under 25 GAR Ch. 12 §  
30 12107(a)(4), PFM is also deemed to hold all “C Licenses.” Under that section, “[a]ny person who

1 qualifies by written examination after the effective date of these rules for a contractors license in  
2 the general engineering contractor classification shall automatically be deemed to hold or be  
3 qualified for a license in the specialities [sic] listed under §12106(a).” 25 GAR Ch. 12 §  
4 12107(a)(4). Since PFM has an “A License,” it also automatically holds all licenses listed under  
5 25 GAR Ch. 12 § 12106(a), which includes all the “C License” subclassifications listed under Title  
6 25 GAR Ch. 12 § 12106(a)(3).  
7

8 Thus, when PFM submitted the following CLB License certificates showing that it held an  
9 “A License” PFM was submitting proof that, under 25 GAR Ch. 12 § 12107(a)(4), it also was  
10 licensed under all “C License” sub-classifications, including C-8, C-13, C-33, C-37, C-41, C-42,  
11 C-48, C-51, C-55, and C-56.  
12



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23 **b. THE LISTS OF PERMITTED HEAVY CONSTRUCTION TRADES AND CRAFTS**  
24 **UNDER TITLE 25 GAR CH. 12 § 12107(a)(1) (“A LICENSES”) AND 25 GAR CH.**  
25 **12 § 12107(a)(2) (“B LICENSES”) INCLUDE ALL “C LICENSE”**  
26 **SUBCLASSIFICATIONS REQUIRED BY THE IFB EXCEPT C-13, C-37, C-51,**  
27 **WHICH WERE COVERED BY PFM SUBCONTRACTORS IN THEIR BID.**

28 In its denial letter, GIAA argued that license holders are limited to the work their license allows them to perform under each subsection of 25 GAR Ch. 12 § 12107(a). Even assuming this



1 to be true, PFM (together with its subcontractor Guam Pacific Mechanical & Electrical, LLC)  
 2 submitted proof that they were licensed to do work under all requisite subclassifications.

3 The following table (“Table B”) includes the lists of heavy construction trades contained  
 4 in 25 GAR Ch. 12 § 12107(a)(1) (“A License”), 25 GAR Ch. 12 § 12107(a)(2) (“B License”), and  
 5 25 GAR Ch. 12 § 12107(a)(3) (“C License” subclassifications”). Each column is copied and pasted  
 6 from the corresponding list in 25 GAR CH. 12 § 12107(a)(1-3). The subclassifications that are  
 7 covered under both a “C License” subclassification and either the “A License” or the “B License”  
 8 list of permitted trades and crafts are in bold. There is much overlap between them:  
 9

11 **“Table B”**

§12106(a)(1) General Engineering Contractor “A License”	§12106(a)(2) General Building Contractor “B License”	§12106(a)(3) Specialty Contractor “C Licenses”
<b>Asphalt Paving &amp; Surfacing</b> <b>Cement Concrete</b> <b>Concrete Paving &amp; Surfacing</b> <b>Classified Specialties</b> <b>Demolition</b> <b>Excavating, Grading &amp;</b> <b>Trenching</b> <b>Fencing</b> <b>Gunite</b> <b>Housing &amp; Building Moving &amp;</b> <b>Wrecking</b> <b>Landscaping</b> <b>Pile Driving &amp; Foundation</b> <b>Pest Control</b> <b>Post Tensioning/Prestress</b> <b>Reinforcing Steel</b> <b>Septic Tank</b> <b>Sewer: Sewage; Disposal Drain;</b> <b>Cement Pipe Laying</b> Stone Masonry <b>Structural Steel</b> <b>Water Proofing</b> <b>Welding</b>	<b>Acoustical Tile</b> <b>Aluminum Roofing &amp; Siding</b> <b>Cabinet &amp; Millwork</b> <b>Carpentry Framing</b> <b>Carpet Laying</b> <b>Cement Concrete</b> <b>Concrete Paving &amp; Surfacing</b> <b>Demolition</b> <b>Drywall</b> <b>Fencing</b> <b>Floor Covering</b> <b>Glazing</b> <b>Gunite</b> <b>House a Building Moving a</b> <b>Wrecking</b> <b>Institutional a Commercial</b> <b>Equipment</b> <b>Insulation</b> <b>Landscaping</b> <b>Lift Slab</b> <b>Limited House Improvement &amp;</b> <b>Renovation Masonry</b> <b>Ornamental Metal</b> <b>Painting &amp; Decorating</b> <b>Pest Control</b> <b>Pile Driving &amp; Foundation</b> <b>Plastering</b> <b>Post Tensioning/Prestress</b> <b>Prefabricated Steel Building</b> <b>Reinforcing Steel</b>	<b>Acoustical Tile</b> <b>Asphalt Paving &amp; Surfacing</b> <b>Aluminum Roofing &amp; Siding</b> Boiler, Hot Water Heating & Steam Fitting <b>Cabinet g Millwork</b> <b>Carpentry Framing</b> <b>Carpet laying</b> <b>Cement Concrete</b> <b>Concrete Paving &amp; Surfacing</b> <b>Demolition</b> <b>Drywall</b> Electrical Electrical Pole & Line Electrical Sign Electronic System Elevator Installation <b>Excavating, Grading &amp;</b> <b>Trenching</b> Fire a Burglar Alarm Fire Protection <b>Floor Covering</b> <b>Glazing</b> <b>Gunite</b> <b>House &amp; Building Moving &amp;</b> <b>Wrecking</b> <b>Institutional &amp; Commercial</b> <b>Equipment</b> <b>Insulation</b> <b>Landscaping</b>

1	<b>Roofing</b>	Lathing
2	<b>Septic Tank</b>	<b>Lift Slab</b>
3	<b>Sheet Metal</b>	<b>Limited House Improvement &amp; Renovation Masonry</b>
4	<b>Spray, Texture Coating</b>	<b>Ornamental Metal</b>
5	Stone Masonry	<b>Painting &amp; Decorating</b>
6	<b>Structural Steel</b>	<b>Pest Control</b>
7	<b>Swimming Pool</b>	<b>Pile Driving &amp; Foundation</b>
8	<b>Tile</b>	<b>Plastering</b>
9	<b>Water Proofing</b>	Plumbing
10	<b>Welding</b>	<b>Post Tensioning/Prestress</b>
11	<b>Wood Flooring</b>	<b>Prefabricated Steel Building</b>
12	<b>Wood Shingle &amp; Shake</b>	Reconditioning Concrete Water & Sewer lines
13	<b>Classified Specialties</b>	Refrigeration
14		<b>Reinforcing Steel</b>
15		<b>Roofing</b>
16		<b>Septic Tank</b>
17		<b>Fencing</b>
18		<b>Sewer; Sewage Disposal Drain:</b>
19		<b>Cement Pipe Laying</b>
20		<b>Sheet Metal</b>
21		Solar
22		<b>Spray, Texture Coating</b>
23		Structural Pest Control
24		<b>Structural Steel</b>
25		<b>Swimming Pool</b>
26		<b>Tile</b>
27		Warm Air Heating, Ventilating & Air Conditioning
28		Water Chlorination
		<b>Water Proofing</b>
		<b>Welding</b>
		Well Drilling
		<b>Wood Flooring Wood Shingle &amp; Shake</b>
		<b>Classified Specialties</b>

All the "C License" subclassifications required by the IFB are also contained in the lists of heavy construction trades and crafts permitted to "A License" and "B License" holders by 25 GAR Ch. 12 § 12107(a)(1) and 25 GAR Ch. 12 § 12107(a)(2) except C-13, C-37, and C-51. The following table ("Table C") shows all of the required categories that are covered by each license:

**"Table C"**

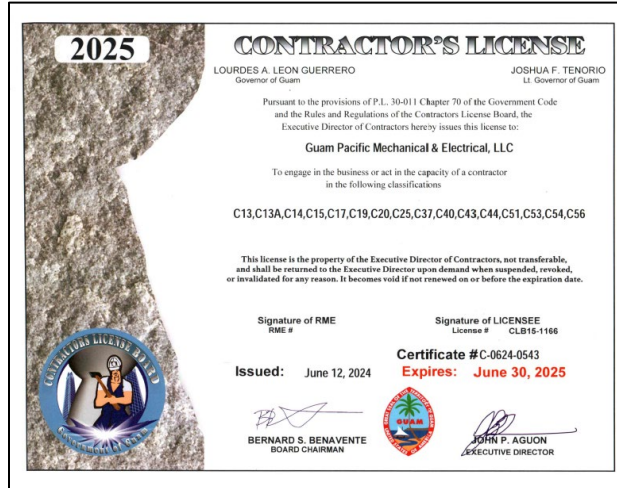
§12106(a)(1) General Engineering Contractor "A License"	§12106(a)(2) General Building Contractor "B License"	§12106(a)(3) Specialty Contractor "C Licenses"
Cement Concrete	Cement Concrete	C-8 Cement Concrete Contractor

1 2 3 4 5 6	Reinforcing Steel Structural Steel Water Proofing Welding	Reinforcing Steel Roofing Contractor Structural Steel Waterproofing Welding	C-13 Electrical Contractor C-37 Plumbing Contractor C-41 Reinforcing Steel Contractors C-42 Roofing Contractor C-48 Structural Steel Contractor C-51 Warm Air Heating, Ventilating and Air Conditioning Contractor C-55 Waterproofing Contractor C-56 Welding Contractor
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7 In addition to its CLB “A License” and “B License”, PFM submitted the license of its  
8 subcontractor: Guam Pacific Mechanical & Electrical, LLC. Guam Pacific Mechanical &  
9 Electrical, LLC’s CLB license shows that holds the following licenses that are not covered by the  
10 “A License” and “B License” lists permitted heavy construction trades and crafts: C-13 (Electrical  
11 Contractor), C-37 (Plumbing Contractor), and C-51 (Warm Air Heating, Ventilating and Air  
12 Conditioning Contractor).

13 Thus, when PFM submitted its CLB License certificates showing that it holds both an “A  
14 License” and a “B License” as well as the Guam Pacific Mechanical & Electrical, LLC CLB  
15 license showing that Guam Pacific Mechanical & Electrical, LLC is licensed in the C-13  
16 (Electrical Contractor), C-37 (Plumbing Contractor), and C-51 (Warm Air Heating, Ventilating  
17 and Air Conditioning Contractor) subclassifications, it successfully submitted proof that it held  
18 licenses in all required categories.





4. **REQUIRING BIDDERS TO HOLD ALL CONTRACTOR LICENSES LISTED BY THE SOLICITATION AT THE TIME OF BID SUBMISSION LIMITS COMPETITION IN CONTRAVENTION OF GUAM LAW.**

A policy espoused by Guam procurement law is to “foster effective broad-based competition within the free enterprise system” and to “provide increased economy in territorial activities and to maximize to the fullest extent practicable the purchasing value of public funds of the Territory.” See 5 GCA §§ 5001(b)(5) and (6). Specifications should further seek to “encourage competition” and “shall not be unduly restrictive.” 5 GCA § 5265.

Rather than following this policy, the Solicitation required all parties to provide licensure in all 12 sub-classifications listed in the Solicitation at the time of bid submission, which unduly limits competition. Requiring licensure at bid submission only enables parties who have gone through the full licensing process to bid, rather than expanding competition to parties who are capable, yet have not yet expended the cost to pay for a CLB license in a required sub-classification.

It is unclear if there are any entities in Guam who hold the unique combination of the 12 different required CLB licenses. By limiting competition only to bidders who hold this unique combination of 12 licenses at the time of bid submittal as opposed to the time of actual performance

1 of the contract work, GIAA unfairly limited competition in violation of Guam procurement law.

2 GIAA has also failed to provide increased economy in territorial activities and maximize  
3 the purchasing value of local funds, as demonstrated in this case, where the bid was ultimately  
4 awarded to the highest rather than the lowest bidder. Such an illogical result is not only  
5 uneconomical but contrary to Guam law.  
6

7 **5. REQUIRING “A LICENSE” HOLDERS TO ALSO HOLD “C LICENSES” WILL RESULT**  
8 **IN ABSURD CONSEQUENCES.**

9 It would not make practical sense to require an “A license” holder to also obtain “C license”  
10 subclassifications. This is because for an entity to hold an “A license”, the CLB would have had  
11 to determine that the entity had specialized knowledge and skill in the following areas, among  
12 others: hydro-electric projects, sewers and sewage disposal plants and systems, power plants and  
13 other utility plants and installations, cement and concrete work, etc. It would be an absurd  
14 construction of the regulations if a holder of an A license would only be able to operate sewers  
15 and sewage disposal plants and systems, but incapable of performing plumbing work without a C-  
16 37 license.  
17

18  
19 An A-license holder would be capable of operating hydro-electric projects, power plants  
20 and other utility plants, but incapable of performing electrical contracting work without a C-13  
21 license. An A-license holder would be capable of performing cement and concrete work in  
22 conjunction with any other work allowed, but incapable of performing cement concrete contracting  
23 work without a C-8 license.  
24

25 Such a tortured interpretation of the statute is plainly absurd.

26 **B. RULING REQUESTED**

27 PFM respectfully requests that the Office of Public Accountability (“OPA”) issue an order  
28 declaring the following:

1 1. That PFM submitted proof of valid Contractor's license showing that it held  
2 licenses in all required categories;

3 2. That Core Tech International Corporation was not the lowest responsive and  
4 responsible bidder;

5 3. That GIAA be required to review all bid submissions, determine the responsiveness  
6 of all bidders, and award the IFB to the lowest priced responsible and responsive bidder; and  
7

8 4. For such further relief that the OPA deems appropriate.

9  
10 **C. SUPPORTING EXHIBITS, EVIDENCE OR DOCUMENTS**

11 Submitted with this appeal are the following exhibits, evidence or documents:

12 1. Exhibit "1" Bid Status – August 19, 2024

13 2. Exhibit "2" Bid Protest – August 29, 2024

14 3. Exhibit "3" Decision – October 14, 2024  
15

16 **PART V - DECLARATION RE: COURT ACTION**

17 The undersigned does hereby confirm that to the best of his knowledge, no case or action  
18 concerning the IFB that is the subject of this appeal has been commenced in court. The undersigned  
19 party agrees to notify the Office of Public Accountability within 24 hours if court action  
20 commences regarding this Appeal or the underlying procurement action.  
21

22 **DATED** this 29th day of October, 2024.

23 **BLAIR STERLING JOHNSON & MARTINEZ**  
24 A PROFESSIONAL CORPORATION

25 BY:   
26

**R. MARSIL JOHNSON**

*Attorneys for Appellant Pacific Federal Management, Inc.*

27 **ATTACHMENTS: EXHIBITS "1", "2" & "3"**

28 A56\60051-05\G:\Drive\Pld\RMJ\2024.10.29 - Notice of Procurement Appeal re Pacific  
Federal Management Inc.



Jerrick Hernandez &lt;jhernandez@guamopa.com&gt;

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## OPA-PA-24-005 Notice of Receipt of Appeal

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**Jerrick Hernandez** <jhernandez@guamopa.com>

Wed, Oct 30, 2024 at 11:09 AM

To: John Quinata &lt;john.quinata@guamairport.net&gt;

Cc: William Brennan &lt;wbrennan@arriolafirm.com&gt;, "R. Marsil Johnson" &lt;rmarsjohnson@bsjmlaw.com&gt;, Isa Baza &lt;ibbaza@bsjmlaw.com&gt;, Arriola Law Firm General Information &lt;attorneys@arriolafirm.com&gt;

Hafa Adai,

Please see the attached Notice of Receipt of Appeal for OPA-PA-24-005. This email will serve as an official notice in lieu of a transmittal via Fax.

Please confirm receipt of this email and the attached document. Thank you.

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Best Regards,



Jerrick J.J.G. Hernandez, MA, CGFM, CFE, CICA, CGAP  
*Accountability Auditor*

**Office of Public Accountability**

+1 671 475 0390 (ext. 204)

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