

ORIGINAL

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**OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEALS**

DATE: 05/06/16

TIME: 4:26 AM PM BY: AL

FILE NO OPA-PA: 16-003

Attorneys for Appellant TLK Marketing Co. Ltd.

**IN THE OFFICE OF PUBLIC ACCOUNTABILITY
HAGATNA GUAM**

In the Appeal of

TLK Marketing,

Appellant.

DOCKET NO. OPA-PA-16-003

**DECLARATION OF JOYCE C.H. TANG
IN SUPPORT OF TLK MARKETING'S
MOTION FOR ORDER AFFIRMING
THE AUTOMATIC STAY AND
REQUIRING THE GUAM VISITORS
BUREAU TO ISSUE A FINAL DECISION
ON PROTEST 2, AND REQUEST FOR
AN EXPEDITED HEARING**

I, **JOYCE C.H. TANG**, hereby declare that:

1. I am a member of the firm of Civile & Tang, PLLC, and submit this declaration in support of Appellant TLK Marketing's (collectively, "TLK") Motion for Order Affirming the Automatic Stay and Requiring the Guam Visitors Bureau to Issue a Final Decision on Protest 2, and Request for an Expedited Hearing.

2. I have personal knowledge of the facts set forth herein, and if called upon to testify, I would and could competently testify thereto.

3. A true and correct copy of the 3/24/16 Protest 1 is attached hereto as **Exhibit A.**
4. A true and correct copy of the 4/21/2016 Protest 2 is attached hereto as **Exhibit B.**
5. A true and correct copy of the 4/04/2016 email from Gina Kono to Henry Lee is attached hereto as **Exhibit C.**
6. A true and correct copy of the 4/29/2016 Letter from Joyce Tang to Thomas Fisher is attached hereto as **Exhibit D.**
7. A true and correct copy of the Guam Visitors Bureau (“GVB”) RFP 2016-006 is attached hereto as **Exhibit E.**
8. A true and correct copy of the 2/16/2016 Initial Evaluation Summary is attached hereto as **Exhibit F.**
9. A true and correct copy of the 2/19/16 Invitation Letters are attached hereto as **Exhibit G.**
10. A true and correct copy of the 2/25/2016 Final Evaluation Summary is attached hereto as **Exhibit H.**
11. A true and correct copy of the 2/25/2016 Board of Directors Regular Meeting Minutes are attached hereto as **Exhibit I.**
12. A true and correct copy of the Partial Transcript of Board Meeting 2/25/16 Tape from Procurement Record from 1:09:50 to 11:11:18 is attached hereto as **Exhibit J.**
13. A true and correct copy of the 3/04/2016 email exchange is attached hereto as **Exhibit K.**

14. A true and correct copy of the 3/09/2016 email exchange is attached hereto as **Exhibit L**.

15. A true and correct copy of the 3/10/2016 12:32 p.m. email is attached hereto as **Exhibit M**.

16. A true and correct copy of the 3/10/2016 7:11 p.m. email is attached hereto as **Exhibit N**.

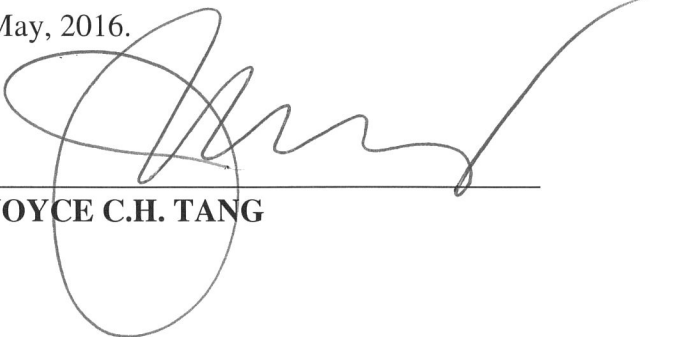
17. A true and correct copy of the 3/14/2016 email is attached hereto as **Exhibit O**.

18. A true and correct copy of the GVB Contract is attached hereto as **Exhibit P**.

19. A true and correct copy of the Notices of Non-Selection is attached hereto as **Exhibit Q**.

I declare under penalty of perjury under the laws of Guam that the foregoing is true and correct.

Respectfully submitted this 6th day of May, 2016.



JOYCE C.H. TANG