

IRIARTE CAMACHO CALVO LAW GROUP LLC

ELYZE M. IRIARTE
eiriarte@icclawgroup.com
134 W Soledad Ave., Suite 401
Hagåtña, GU 96910
Tel No. 671.472.6813
Fax No. 671.477.4375

RECEIVED
OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEALS

DATE: 8/5/16

TIME: 4:25 AM PM BY: JP

FILE NO OPA-PA: 16-006

Attorneys for Appellant
BASIL FOOD INDUSTRIAL SERVICES CORPORATION

BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY

In the Appeal of

BASIL FOOD INDUSTRIAL SERVICES
CORPORATION,

Appellant.

Docket No. OPA-PA-16-006

APPELLANT'S LIST OF ISSUES

Appellant Basil Food Industrial Services Corporation lists the following issues to be determined by the OPA:

OPA-PA-16-006

1. Whether GSA improperly terminated GSA-010-14 and GSA-011-14 ("Contracts").
2. Whether GSA should have permitted Basil to cure any default.
3. Whether GSA should have utilized the emergency menu option under the Contracts.
4. Whether GSA erred in relying on the earlier default of Basil caused by the lack of a certified HACCP Plan.
5. Whether DPHSS unfairly targeted Basil in the process of requiring food

ORIGINAL

three times market price for ENP services.

11. Whether SH is a qualified bidder for ENP services.
12. Whether SH is a responsive bidder for the emergency procurement.
13. Whether SH has complied with all requirements of the emergency procurement.
14. Whether the emergency procurement should be cancelled.

DATED: Hagåtña, GU, 5 August, 2016.

IRIARTE CAMACHO CALVO LAW
GROUP LLC



ELYZE MCDONALD IRIARTE

Attorneys for Appellant
BASIL FOOD INDUSTRIAL SERVICES
CORPORATION