



**Office of the Attorney General**  
**Elizabeth Barrett-Anderson**  
 Attorney General of Guam  
**Solicitor Division**  
 590 S. Marine Corps Drive  
 ITC Bldg., Ste. 802  
 Tamuning, Guam 96913 • USA  
 Tel. (671) 475-3324 Fax. (671) 472-2493  
 www.guamag.org

**RECEIVED**  
 OFFICE OF PUBLIC ACCOUNTABILITY  
 PROCUREMENT APPEALS

DATE: Dec. 20, 2017  
 TIME: 9:40  AM  PM BY: [Signature]  
 FILE NO OPA-PA: 17-010

**Attorneys for the Government of Guam**

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

<p><b>IN THE APPEAL OF:</b></p> <p><b>CORE TECH INTERNATIONAL CORP.,</b></p> <p style="text-align: center;"><b>Appellant,</b></p> <p><b>AND</b></p> <p><b>DEPARTMENT OF PUBLIC WORKS,</b></p> <p style="text-align: center;"><b>Purchasing Agency.</b></p>	<p>) <b>DOCKET NO. OPA-PA-17-010</b></p> <p>)</p> <p>)</p> <p>) <b>DEPARTMENT OF PUBLIC WORK'S</b></p> <p>) <b>SUPPLEMENTAL TO</b></p> <p>) <b>PROCUREMENT RECORD</b></p> <p>)</p> <p>)</p> <p>)</p>
--	--

COMES NOW, Purchasing Agency, Department of Public Work ("DPW"), by and through its undersigned counsel, herein submits documents and CDs in the above-captioned matter, as follows:

- Declaration of Thomas Keeler
- CD – Non-Compliance Reports
- CD – OPA-PA 17-010 Plans and Specs
- CD – Contract Documents and Change Order No. 3

**ORIGINAL**

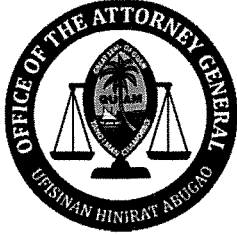
- CD – OPA-PA 17-010 (Utility Relocation Plan, Shop Drawings – Bridge 2 Rear Abutment QC Procedures for Concrete Aggregate Testing)
- CD – FOIA Request – Communication (emails) between TPG and DPW (Mike Hobbs, David Titzel, David Yao)
- CD – Final Design – Civil Drawings and Schedule of Work for ADA Ramps, Driveways and Sidewalks
- CD – OPA-PA 17-010 F-82 and F-82 AG Checklist
- CD – Project Documents (6 CDs in one set, total of 30 CDs)
- CD – Project Communication – Emails (4 CDs in one set, total of 20 CDs)
- CD – WSP F/N/A Parsons Brinkerhoff – Route 1 Route 8 Agana Bridges FOIA request electronic emails

Submitted this 20<sup>th</sup> day of December, 2017.

OFFICE OF THE ATTORNEY GENERAL  
**Elizabeth Barrett-Anderson**, Attorney General

By:

  
**THOMAS P. KEELER**  
Assistant Attorney General



**Office of the Attorney General**

**Elizabeth Barrett-Anderson**

Attorney General of Guam

**Civil Litigation Division**

590 S. Marine Corps Drive

Tamuning, Guam 96913 • USA

(671) 475-3324 • (671) 472-2493 (Fax)

www.guamag.org

Attorneys for the Government of Guam

**THE OFFICE OF PUBLIC ACCOUNTABILITY  
HAGÁTÑA, GUAM**

In the Appeal of: )

Core Tech International Corp., )

Appellant, )

and )

GUAM DEPARTMENT OF )  
PUBLIC WORKS )

Purchasing Agency )

**DOCKET NO. OPA-PA-17-10**

**DECLARATION OF  
THOMAS P. KEELER**

**THOMAS P. KEELER** makes this declaration under penalty of perjury under the laws of Guam and states:

1. I am employed as an Assistant Attorney General by the Office of the Attorney General of Guam.

2. The Guam Department of Public Works (“DPW”) Highway Division has been ordered to supplement the procurement record in this matter by Wednesday, December 20, 2017.

3. DPW, its consultants, Parsons Transportation Group (“PTG”) and WSP USA, Inc. f/k/a Parsons Brinkerhoff (“WSP”), and the Guam Office of the Attorney General have diligently reviewed their respective records and are submitting all records in their possession, with the possible exception of one item.

4. At or about the time of award of contract it is my understanding that the Office of the Attorney General was provided sealed escrow documents (“Sealed Escrow Documents”) for safe keeping.

5. I am informed that the Sealed Escrow Documents contain Core Tech International Corp.’s (“Core Tech”) pricing information.

6. DPW, its consultants, and the Office of the Attorney General have made a good faith effort to locate the Sealed Escrow Documents but have been unable to locate them.

7. Although DPW is not able to produce the Sealed Escrow Documents such does not prejudice Core Tech as Core Tech is already in possession of said documents.

I declare under penalty of perjury that the aforementioned is true.

Submitted this 20<sup>th</sup> day of December, 2017.

By:

  
THOMAS P. KEELER