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Fisher & Associates
Attorneys at Law
Suite 101 De La Corte Building
167 East Marine Corps Drive
Hagåtña, Guam 96910
Phone (671) 472-1131
Fax (671) 472-2886

RECEIVED
OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEALS
DATE: Feb 13, 2019
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FILE NO OPA-PA: A-001

**IN THE OFFICE OF PUBLIC ACCOUNTABILITY
FOR THE TERRITORY OF GUAM**

IN THE APPEAL OF JJ GLOBAL) OPA-PA 19-001
SERVICES)
Appellant) **OPPOSITION TO MOTION TO
SUPPLEMENT A PROCUREMENT
RECORD**

*****OPPOSITION****

COMES NOW the Guam Visitors Bureau (GVB) and Opposes a Motion to Supplement a Procurement Record.

JJ Global has received the entire Procurement Record, a Procurement Record provided pursuant to this Appeal, and an Agency Report. It now complains that the procurement record provided it is incomplete since it contains no log of communication between GVB and potential bidders or the public. This is because such a log does not exist and GVB will not create one post hoc.

JJ Global says it believes the Agency may have excluded other relevant documents from the procurement record. JJ Global has no evidence of this; it merely accuses. In any event, it is welcome to inspect the entire record *yet again*.

1 Finally, JJ Global asks to subpoena certain witnesses. This need not be the
2 subject of a motion, it may of course do so as part of the merits hearing. JJ
3 Global may have meant to ask for the ability to depose certain individuals. The
4 Agency has no objection to this but will itself request subpoenas and notices for
5 deposition to issue to Mr. Louis Bustamante and Ms. Rose Meno. The Agency
6 believes these two (the owner and an employee of JJ Global respectively) have
7 knowledge of a criminal fraud perpetrated upon GVB as well as this Office.

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9 Thomas J. Fisher
10 Attorney for Guam
11 Visitors Bureau
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