

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

# [eFile] OPA-PA-20-003: SH Enterprises, Inc.'s Exhibit List, Witness List, and List of Issues

## Almin Manlucu <am@vlwilliamslaw.com>

Wed, Jan 27, 2021 at 4:32 PM

To: Jerrick Hernandez < jhernandez@guamopa.com>

Cc: admin@guamopa.com, smiller@oagguam.org, Robert Kono <robert.kono@gsa.guam.gov>, gdiaz@icclawgroup.com, Vanessa Williams <vlw@vlwilliamslaw.com>, Lea Mara <lm@vlwilliamslaw.com>

Håfa Adai Jerrick,

Please find the attached for filing in the above-referenced matter, as follows:

- SH Enterprises, Inc.'s Exhibit List
- SH Enterprises, Inc.'s Witness List
- · SH Enterprises Inc.'s List of Issues

Kindly return a filed stamped copy through email.

Please let us know if you have any questions or concerns. Thank you for your attention to this matter.

Sincerely,

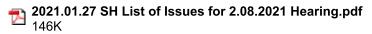
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## 3 attachments





2021.01.27 SH Enterprises, Inc.'s Exhibit List.pdf 7820K

1 2 3	Vanessa L. Williams, Esq. Law Office of Vanessa L. Williams, P.C. 414 West Soledad Avenue GCIC Bldg., Suite 500 Hagåtña, Guam 96910
4	TELEPHONE: 477-1389 EMAIL: VLW@VLWILLIAMSLAW.COM
5	Attorney for Interested Party SH Enterprises, Inc.
6	BEFORE THE PUBLIC AUDITOR
7	PROCUREMENT APPEALS
9	IN THE APPEAL OF:  ) APPEAL NO. OPA-PA-20-003
LO L1	BASIL FOOD INDUSTRIAL SERVICES CORPORATION, SH ENTERPRISES, INC.'S LIST OF ISSUES
12	Appellant.
L3	COMES NOW, Interested Party SH Enterprises, Inc. ("SH Enterprises"), by and through
L4	the undersigned counsel, hereby submits its List of Issues which to be determined at the February
L5	8, 2021 hearing on this matter:
L6	1. Whether the Public Auditor has authority to debar or suspend SH on a procurement
L7	appeal when the Public Auditor's jurisdiction is limited to reviewing a decision to debar or
L8	suspend a contractor when properly submitted to it, and GSA did not issue such a decision.
L9	2. Whether debarment or suspension proceedings before the Public Auditor denies
20	SH the due process requirement of the Guam Procurement Law, Guam Procurement Regulations
21	and the Administrative Adjudication Law.
22	3. Whether SH should be debarred or suspended when it received consideration of
23	substantially equal or greater value than the use of its building, there was no relationship between
24	the challenged procurement – GSA-056-019 – and the use of the building by the Governor's
25	office, and where debarment and suspension are not interest best interests of the government nor
26	fair.
27	
28	

Respectfully submitted this 27th day of January, 2021.

LAW OFFICE OF VANESSA L. WILLIAMS, P.C.

Attorney for Interest Party SH Enterprises, Inc.

VANESSA L. WILLIAMS, ESQ.