

Jerrick Hernandez < jhernandez@guamopa.com>

In the Appeal of G4S Security Systems (Guam), Inc.; Appeal No. OPA-PA-21-007

Tammy Reyes treyes@calvofisher.com

Wed, Nov 24, 2021 at 3:36 PM

To: "jhernandez@guamopa.com" <jhernandez@guamopa.com>

Cc: "jlgstake@gdoe.net" <jlgstake@gdoe.net>, "legal-admin@gdoe.net" <legal-admin@gdoe.net>,

"teresa.sakazaki@gu.g4s.com" <teresa.sakazaki@gu.g4s.com>, "jdwalsh@rwtguam.com" <jdwalsh@rwtguam.com>,

"Genevieve P. Rapadas" <grapadas@calvofisher.com>, Rodney Jacob <rjacob@calvofisher.com>

Dear Mr. Hernandez,

Please see attached submission of Appellant G4S Security Systems (Guam), Inc.'s List of Issues to be filed in the above-referenced action.

Please let me know whether you have any issues accessing the attachments. Thank you.

Regards,

Tammy L. Reyes

Legal Assistant



259 Martyr Street, Suite 100

Hagåtña, Guam 96910

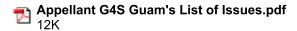
e: treyes@calvofisher.com

t: 671-646-9355

f: 671-646-9403

www.calvofisher.com

This e-mail message is intended only for the use of the individual or entity named above and may contain confidential and privileged information. If you are not the intended recipient, any disclosure, copying, distribution or use of the information contained in this transmission is strictly PROHIBITED. If you have received this transmission in error, please immediately notify us. Reply info@calvofisher.com, and delete the message immediately. Thank you very much.



1 2 3 4 5 6 7 8 9 10		PUBLIC ACCOUNTABILITY ENT APPEALS
12	In the Appeal of	Appeal No. OPA-PA-21-007
13		
14	G4S Security Systems (Guam), Inc.,	APPELLANT G4S SECURITY SYSTEMS (GUAM), INC.'S LIST OF ISSUES
15	Appellant.	
16		
17		
18		
19		
20		
21		
22		
2324		
25		
26		
27		
28		
20		

557363.doc

G4S SECURITY SYSTEMS (GUAM), INC. ("Appellant" or "G4S"), respectfully 1 2 submits the following list of issues which require evidence or arguments to be presented at 3 Hearing: 4 1. Whether it is necessary to obtain a Contractors License and C68 Specialty License from the Guam Contractors License Board ("GCLB") to perform the work 5 required under Guam Department of Education ("GDOE") Invitation for Bid 026-2021 - Indoor and Outdoor Wireless Local Area ("WLAN") Infrastructure 6 Installation Project (the "IFB"). 7 2. Whether the terms of the IFB required bidders to hold a valid Contractors License 8 and C68 Specialty License, or any other specialty licenses, from the GCLB. 9 3. Whether GDOE properly considered Technologies for Tomorrow Inc. ("TFT") a 10 responsible and responsive bidder on the IFB despite TFT not holding certain licenses necessary to perform the work under the IFB, including but not limited to, 11 a valid Contractors License or C68 Specialty License from the GCLB or a valid business license from the Department of Revenue and Taxation. 12 13 Appellant reserves the right to amend or supplement this List of Issues. 14 Respectfully submitted this 24th day of November, 2021. 15 CALVO FISHER & JACOB LLP 16 Attorneys for Appellant G4S Security Systems (Guam), Inc. 17 18 19 By: GENEVIEVE P. RAPADAS 20 21 22 23 24 25 26 27 28