



Jerrick Hernandez <jhernandez@guamopa.com>

RE: In the Appeal of Beach Resort LLC dba Hotel Sante Fe, Guam, OPA-PA-20-005

2 messages

Fely Palomo <FELY@guamlaw.net>

Mon, Aug 24, 2020 at 2:15 PM

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

Cc: Georgette Concepcion <gbc@guamlaw.net>, Clare Leon Guerrero <Clare@guamlaw.net>, Lisa Brooks <Lisa@guamlaw.net>, "Terrence M. Brooks" <tmb@guamlaw.net>, "smiller@oagguam.org" <smiller@oagguam.org>, "gsaprocurment@gsadoa.guam.gov" <gsaprocurment@gsadoa.guam.gov>

Jerrick,

Attached are the following documents for filing on the above subject matter:

- a. Appellant's Witness List
- b. Appellant's List of Issues
- c. Appellant's Exhibit List

Please forward filed copies to this email address.

Thanks,

Felysha S. Palomo**BROOKS CONCEPCION LAW, P.C.****247 Martyr Street, Suite 101****Hagatna, Guam 96910****Phone: (671) 472-6848**

A SMART APPROACH TO LEGAL SERVICE

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3 attachments

 **Appellant's List of Issues.pdf**
34K

 **Appellant's Witness List.pdf**
43K

 **Appellant's Exhibit List .pdf**
16764K

Jerrick Hernandez <jhernandez@guamopa.com>

Mon, Aug 24, 2020 at 3:53 PM


To: Fely Palomo <FELY@guamlaw.net>


Cc: Office of Public Accountability <admin@guamopa.com>, Georgette Concepcion <gbc@guamlaw.net>, Clare Leon Guerrero <Clare@guamlaw.net>, Lisa Brooks <Lisa@guamlaw.net>, "Terrence M. Brooks" <tmb@guamlaw.net>, "smiller@oagguam.org" <smiller@oagguam.org>, "gsaprocurment@gsadoa.guam.gov" <gsaprocurment@gsadoa.guam.gov>

confirming receipt.

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2 attachments

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1 **BROOKS CONCEPCION LAW, P.C.**
2 **247 Martyr Street, Ste. 101**
3 **Hagatna, Guam 96910**
4 **(671) 472-6848**
5 **(671) 477-5790**

6 **BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY**

7 **In the Appeal of**) **DOCKET NO. OPA-PA-20-005**
8)
9 **BEACH RESORT LLC dba THE**)
10 **HOTEL SANTE FE GUAM,**) **APPELLANT'S**
11) **LIST OF ISSUES**
12) **Appellant**)

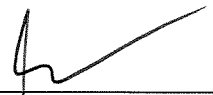
12 **COMES NOW**, the BEACH RESORT LLC dba The Hotel Santa Fe (“Santa Fe”), by and
13 through its counsel of record, Georgette Bello Concepcion of Brooks Concepcion Law, P.C. and
14 submits its Statement of Issues for the August 31, 2020 hearing.

- 15
- 16 1. Whether GSA wrongfully terminated Santa Fe’s Contract/Purchase Order ?
 - 17 2. Whether the list of discrepancies listed in GSA’s Termination Letter were non-
18 existent?
 - 19 3. Whether GSA is obligated to compensate Santa Fe for unoccupied rooms from May
20 16, 2020 up through May 27, 2020 and occupied rooms from May 18, 2020 through May 27, 2020
21 under the terms of the Contract/Purchase Order regardless of whether or not GSA wrongfully
22 terminated said contract?
23

24 Respectfully submitted this 24th day of August, 2020.

25 **BROOKS CONCEPCION LAW, P.C.**

26
27 By:



Georgette Bello Concepcion, Esq.
Counsel for Appellant Santa Fe