



Jerrick Hernandez &lt;jhernandez@guamopa.com&gt;

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**See Attached (4) - E-Filed OPA and E-Served - Guahan Ventures Inc. dba Turfco - OPA-PA-21-003**

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**Marie L. Cruz** <mlcruz@oagguam.org>

Fri, Sep 10, 2021 at 3:40 PM

To: Jerrick Hernandez &lt;jhernandez@guamopa.com&gt;

Cc: Marlyn Aguilar &lt;maguilar@oagguam.org&gt;, jdwalsh@rwtguam.com, cpollard@rwtguam.com

Good Afternoon Jerrick: I am E-Filing the following attachments:

- GSA List of Issues
- GSA Witness List
- GSA Exhibit List and Exhibits A - J

Also, E-Service to Razzano Walsh & Torres, P.C., attention Joshua Walsh.  
Please acknowledge email and attachment receipt. Thank you.

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**4 attachments** **GSA List of Issues -OPA-PA-21-003.pdf**  
69K **GSA Witness List -OPA-PA-21-003.pdf**  
70K **GSA Exhibit List -OPA-PA-21-003.pdf**  
74K **GSA Exhibits.pdf**  
6169K



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**Attorneys for the Government of Guam**

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

<b>IN THE APPEAL OF:</b>	)	<b>DOCKET NO. OPA-PA-21-003</b>
	)	
<b>GUAHAN VENTURES INC. dba TURFCO</b>	)	
	)	
<b>Appellant.</b>	)	<b>PURCHASING AGENCY</b>
	)	<b>GSA'S LIST OF ISSUES</b>
<b>and</b>	)	
	)	
<b>GENERAL SERVICES AGENCY,</b>	)	
	)	
<b>Purchasing Agency.</b>	)	

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**COMES NOW GENERAL SERVICES AGENCY (“GSA”)**, the purchasing agency in this protest appeal, and submits the following List of Issues which require evidence or arguments to be presented at the hearing scheduled for September 16, 2021.

**LIST OF ISSUES**

1. Whether GSA’s Emergency Procurement violated Guam Procurement Law.
2. Whether the change to the delivery requirement was allowed under Guam Procurement Law.

3. Whether the change to the delivery requirement changed the procurement to sole source procurement and violated Guam Procurement Law.

Submitted this 10<sup>th</sup> day of September, 2021.

OFFICE OF THE ATTORNEY GENERAL  
**Leevin Taitano Camacho**, Attorney General

By:



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**MARLYN T. AGUILAR**  
Assistant Attorney General