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**RECEIVED**  
OFFICE OF PUBLIC ACCOUNTABILITY  
PROCUREMENT APPEALS  
DATE: 6/17/2014  
TIME: 3:00  AM  PM BY: M.B.  
FILE NO OPA-PA: 14-004

Attorneys for Appellant  
G4S Security Systems, (Guam) Inc.

**THE OFFICE OF PUBLIC ACCOUNTABILITY**

In the Procurement Appeal of	)	Docket No. OPA-PA-14-004
	)	
G4S SECURITY SYSTEMS,	)	<b>MOTION TO PRODUCE</b>
(GUAM) INC.,	)	<b>PROCUREMENT RECORD</b>
	)	
Appellant.	)	
_____	)	

G4S Security Systems, (Guam), Inc. (“G4S”), filed its appeal herein on May 20, 2014, and served the notice of appeal on the Department of Public Works (“DPW”) on that same day. *See, Exhibit A.*

On May 22, 2014, the Office of Public Accountability (“OPA”), issued its “Amended Notice of Receipt of Appeal” and ordered the DPW to submit its procurement record to the OPA by May 30, 2014. Pursuant to 2 GAR § 12104(c)(3), “a Purchasing Agency shall submit to the Public Auditor a complete copy of the procurement record relevant to the appeal within five (5) working days of receiving notice of any Appeal ... .” Accordingly, the procurement record was actually due on May 27, 2014. Nonetheless, the DPW did not submit its procurement record by that date or by the May 30, 2014, date established by the OPA’s “Amended Notice of Receipt of Appeal.” To date, and despite the OPA’s Rules of Procedure and its orders herein, the DPW has still not submitted its procurement record.

ORIGINAL

*In the Procurement Appeal of  
G4S Security Systems, (Guam) Inc.  
OPA Docket No. OPA-PA-2014-004  
Motion to Produce Procurement Record*

On June 13, 2014, G4S filed its Motion to Set Hearing Date and to Preclude Consideration of DPW Arguments. For purposes of being able to knowledgeably proceed with a hearing in this matter, G4S also now moves the OPA to order the DPW to produce its entire procurement record. The DPW is absolutely required to produce its procurement record in proceedings before the OPA. The DPW has been ordered to produce its procurement record by virtue of the May 22, 2014, OPA "Amended Notice of Receipt of Appeal." And, the DPW procurement record is a public document which must be produced for inspection and copying pursuant to the mandates of 5 GCA § 5251.

Accordingly, based on the foregoing, G4S respectfully moves the OPA to order that the DPW submit to the OPA and serve on counsel for G4S, its entire procurement record for this procurement. The DPW should be ordered to produce the record within five (5) days of the Hearing Officer's order for that purpose as required by 2 GAR §12104(7).

Respectfully submitted this 17<sup>th</sup> day of June, 2014.

DOOLEY ROBERTS & FOWLER LLP

By:

  
\_\_\_\_\_

**KEVIN J. FOWLER**

Attorneys for Appellant

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PROCUREMENT APPEALS

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TIME: 3:50  AM  PM BY: JH

FILE NO OPA-PA: 14-004

**THE OFFICE OF PUBLIC ACCOUNTABILITY**

In the Procurement Appeal of )  
)  
G4S SECURITY SYSTEMS, )  
(GUAM) INC., )  
)  
Appellant. )  
\_\_\_\_\_ )

Docket No. OPA-PA-14-004

**NOTICE OF APPEAL**

**Appellant Information:**

G4S Security Systems, (Guam) Inc. ("G4S")  
1851 Army Drive  
Tamuning, Guam 96913-1254

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**Appeal Information:**

- A) Department of Public Works, government of Guam ("DPW").
- B) Invitation for Bid, Project No. 480-5-1052-DMHSA FMT-TAM; Upgrading of Telecommunication Building Infrastructure & Cabling System for DMHSA Main Building in Tamuning.
- C) Decision being appealed is the DPW's May 2, 2014, Notice of Termination of Contract Agreement.
- D) Appeal is made from a decision on a contract controversy.
- E) Names of competing bidders: N/A.



MAY 20 2014

5:00

