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5 PACIFIC DATA SYSTEMS, INC.

RECEIVED
OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEALS

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FILE NO OPA-PA: 14-003

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7 **OFFICE OF PUBLIC ACCOUNTABILITY**

8 Docket No. OPA-PA 14-003

9 In the Appeal of
10 PACIFIC DATA SYSTEMS, INC.,
11 Appellant.

**MOTION TO COMPEL PRODUCTION
OF THE COMPLETE PROCUREMENT
RECORD**

12 An Appeal in this matter was filed by Appellant, Pacific Data Systems, Inc.
13 (hereinafter "PDS") on April 16, 2014. Pursuant to 2 GAR §12104(c)(3) Guam Visitors
14 Bureau (hereinafter "GVB") was required to file with the Office of Public Accountability
15 (hereinafter "OPA") its Procurement Record in this Appeal by April 24, 2014. On April
16 23, 2014, GVB, through its Counsel, Fisher and & Associates, did file the Procurement
17 Record with the OPA in this appeal.

18 The documents which comprise the Procurement Record are stated in 5 GCA
19 §5249, and repeated verbatim in 2 GAR §3129. GVB has seriously failed to comply with
20 its obligation to submit a complete procurement record.

21 1. 2 GAR §3129(1) requires a record of any meeting held between
22 Government employees related to this procurement. GVB has only made a partial
23 submission at this time related to meetings after the bid turn in date. GVB has not
24 included any meetings regarding the development of the IFB specifications and
25 requirements and who participated in these meetings.

26 2. 2 GAR §3129(2) requires a log of all communications between government
27 employees and any member of the public, potential bidder, vendor or manufacturer
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2 which is in any way related to the procurement. GVB has currently only made
3 available communications between GVB and potential bidders after the bid was
4 publically announced. No communications between Government employees or with
5 potential vendors/bidders, etc. prior to the publication of the IFB have been provided.

6 3. 2 GAR §3129(4) requires brochures and submittals of potential vendors,
7 manufacturers or contractors, and all drafts, signed and dated by the draftsman, and
8 other papers or materials used in the development of the specifications. At this time
9 GVB has not provided any materials from this part of the record and has stated "No
10 brochures or other submittals were made in the development of specifications".

11 PDS disagrees with this statement by GVB since it is obvious that this IFB had
12 many specifications and must have had many drafts prior to finalization. It would be
13 impossible for GVB to develop the complex specifications in this procurement without
14 drafts and other written documents. In fact, PDS has determined that many of the
15 technical specifications used in the GVB IFB specifications are a verbatim reproduction
16 from G4S brochures. See the attached Exhibit A of the IFB specifications that have been
17 matched to brochures contained in the G4S Technical Bid, which is attached as
18 Exhibit B. The Procurement record should include the source of these data sheets and
19 technical specifications including any proposals or correspondence between G4S and
20 GVB related to CCTV systems.

21 Finally, 2 GAR §3130, which is based on 5 GCA §5250, requires a copy of a
22 certification of the Procurement Record. GVB has not provide any certification of the
23 procurement record to date.

24 PDS requests that the OPA order GVB to produce the complete and accurate
25 Procurement Record immediately. PDS requests the ability to amend its comments on
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the Agency Report until a reasonable period after PDS has had an opportunity to review the full and accurate Procurement Record.

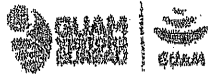
DATED this 2th day of May, 2014.

Respectfully submitted,

BERMAN O'CONNOR & MANN
Attorneys for Appellant
PACIFIC DATA SYSTEMS, INC.

By: 
BILL R. MANN

Exhibit "A"



B-1. PHASE II: EVALUATION OF BID COSTS AND SELECTION OF AWARD

An award shall be given to the contractor whose submission meets these specifications at the most competitive price. The Guam Visitors Bureau will review, evaluate, and assign scores using the selection and award criteria indicated in this Multi-Step Bid. Each step of the Multi-Step Bid process shall be conducted as mandated by Guam's Procurement Law, Rules, and Regulations to safeguard the integrity of the competitive sealed bidding process. The Guam Visitors Bureau also utilizes its administrative policies approved by its Board of Directors.

Only the bidders or offerors determined by the Guam Visitors Bureau to have met or exceeded the Technical Bid specifications in Phase I will be considered in Phase II. The Bid Cost shall be submitted by "filling in the blanks" on the Bid Cost forms provided in this Multi-Step Bid.

The selection committee shall independently score each Bid Cost submittal using only the evaluation criteria set forth in this Multi-Step. The bidder or offeror determined by the selection committee to be the most responsive and responsible and submitted an offer that meets or exceeds both the Technical and Bid Cost specifications will be recommended for the Bid Award.

Once the final scores are tabulated, the selection committee will prepare the Memorandum of Evaluation and Recommendation for Award. The Guam Visitors Bureau General Manager who also serves as the GVB GM&CPO shall approve or reject the committee's recommendation. The GVB GM&CPO is the sole authority to negotiate for the best and final offer; to Award the Bid; to contractually bind GVB and to issue the Notice to Proceed to the successful bidder.

B-2. NEW ADDITIONAL CCTV SYSTEM COMPONENTS – MINIMUM SPECIFICATIONS

The following specifications are provided as a reference for replacement and new CCTV system equipment. The bidder shall offer CCTV system components that are equivalent to or exceeds the minimum specifications indicated for each component. .

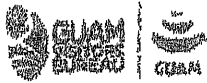
B-2.1: CCTV Surveillance Systems

a. Pan-Tilt-Zoom Dome, Pendant/Wall-Mounted - The Contractor shall provide an integrated package that includes matching mounting brackets, heater, dome drive, smoked lower dome, and color camera. The Contractor shall coordinate with chosen PTZ equivalent with its manufacturer prior to bid to ensure that proposed pan/tilt/zoom unit will operate in the existing CCTV system. The cameras shall be housed in IP66/NEMA 4 casings. All housings shall be of the same make as that of the camera. The following supply shall meet the following minimum requirements;

b. Features:

- 1152X Zoom (36X Optical, 32X Digital)
- 700 TV Lines Ultra Image Resolution
- Day & Night with true night function, 0.001 Lux High Sensitivity
- Wide Dynamic Range (WDR), Privacy masking Zone & Digital Noise Reduction
- Endless Panning and Multi-protocol support
- All in One Camera with Full accessories for mounting and connection
- Aluminum Die-Cast, IP66

same as
G4S
Page 76



- 360+ Continuous Rotation
- Built-in Heater, Blower & Sunshield for any weather for Indoor and Outdoor Applications

c. Specifications:

- Image Sensor – ¼" Super HAD II CCD (Double Scan)
- Scanning Frequency – 15.734 KHz (H) x 60Hz (V)
- Scanning System – Progressive (WDR On)/Interlace
- Sync. System – Internal
- Resolution – 700 TVL (Color), 800 TVL (BW)
- Min. Illumination – Color: 0.5 Lux, ICR BW: 0.2 Lux, DSS Color: 0.001 Lux, ICR+DSS BW: 0.0004 Lux
- S/N Ratio – More than 50dB (AGC off)
- Focus – Auto/Zoom-Trig/Manual
- Focal Length – 3.4-122.4 mm, (F1.6 to F4.5)
- Electronic Shutter – Normal – 1/100,000
- Video Output – 1 x BNC
- Power Source – 21-28 VAC
- Power Consumption – 18W for Dome, 33W for Heater & Fan 3.4 W
- Dimensions – 236 x 323.7 (H) mm -166 Dome
- Weight – 4.4 Kg (10.8 lbs.)
- Operating Temp. – Indoor 0 deg C, outdoor -10 deg, C- 50 deg C
- Operating Humidity – 0-90% (non condensing)
- Ingress Protection – IP66
- Approvals – CE, FCC CLASS A, RoHS

same as
specs from
G4S
Page 76

d. Fixed Camera - The Contractor shall provide a complete unit that includes housing, with a viewing window that conceals camera/lens, matching mounting brackets, heater, and color camera with the following characteristics:

e. Features:

- 700 TV Lines Ultimate High Resolution
- Day & Night with True Night function, 0.03 Lux Sensitivity
- New enhanced video analysis; (Motion Detection & Tracking, Abandon Detection, Scene Change, Unfocused Detection, Loitering Detection)
- Privacy Masking Zones & Digital Image Stabilizer
- Wide Dynamic Range & 3D-DNR (3D-Digital Noise Reduction)
- New Digital effects (Rotation, Mirror, V Flip, Neoga, Freeze)
- Unshielded Twisted Pair (UTP) for far distances transmission

same as
specs
from G4S
Page 77

f. Specifications:

- Image Sensor – 1/3" Sony 960H DS SUPER HAD II CCD
- Picture Elements – 1020 H x 596 V
- Scanning Frequency – 15.625 KHz (H), 50Hz (V)
- Scanning System – 2:1 Interlace
- Sync. System – Internal / Line Lock
- Resolution – 700TVL



- Minimum Illumination – 0.14 Lux (Color), 0.03 Lux (BW)
- S/N Ratio – More than 50 dB
- Video output – 1 x BNC (1.0 Vp-p, 75 ohms)
- Power Source – DC 12V/AC 24+/- 10%
- Dimensions – 78.8 W x 64 H x 118.4 D
- Weight – 260g
- Operating Temp. - -10 deg C - +50 deg C
- Operating Humidity – 20%-80%
- Approvals – FCC (Class A), UL, CE (Class A)

same as
G4S
Page 77

g. Keyboard Controller – The Contractor shall provide digital keyboard controller with the following requirements;

- Pan/Tilt/Zoom Joystick
- Focus/Iris Key Switches
- 64(254) Connection Dome, without alarm check 254 address
- 4 (1Master/3 Slave) HID 2 404CE
- 64 x 4 Matrix Function (Use 5 Triplexer) Automatic Sequence

same as
G4S
Page 84

h. Digital Video Recorder - The Contractor shall provide digital video recorders with the following characteristics:

- Real-Time Monitoring for all cameras @ 720x576
- Real-Time Recording 400ips @ CIF with D1 recording capability
- H.264 Effective Video compression
- Maximum Stability with Linux RTOS on Flash
- Two-way Audio Communication
- Various Scheduled Recording Modes/Camera
- Up to 30 minutes pre-event recording
- Extreme Remote Management
- Advanced Search Engine & Playback Modes with
- Intrusion detection, Video obscuration detection
- 3x SATA HDDs (up to 6TB) with DVD-RW
- ATM/POS Interface, with Integration with 3rd Party ATM Models (Diebold Compatible)

same as
G4S
Page 78

i. Matrix Switcher – The Contractor shall provide a matrix switcher with the following characteristics:

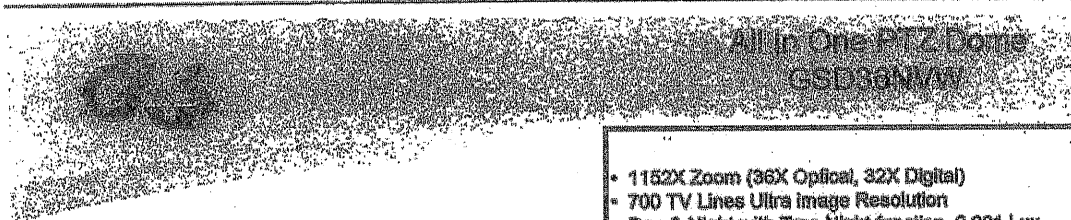
i. Features:

- 32 video inputs with video looping and 8 monitor outputs
- with OSD function
- Up to 32 devices like dome camera or DVR controllable
- via multi-protocol with keyboard controller Full Event Log
- & Monitoring

Exhibit "B"



Recommended Products:



All in One PTZ Dome
GSD30M/W

- 1152X Zoom (36X Optical, 32X Digital)
- 700 TV Lines Ultra image Resolution
- Day & Night with True Night function, 0.001 Lux High Sensitivity
- Wide Dynamic Range (WDR), Privacy masking Zone & Digital Noise Reduction
- Endless Panning and Multi protocol support
- All in One Camera with Full accessories for mounting and connection
- Aluminum Die-Cast, IP66
- 360+ Continuous Rotation
- Built-in Heater, Blower & Sunshield for any weather for Indoor and Outdoor Applications

Technical Specifications

Module

Image Sensor	1/4" SONY Super HAD II CCD (Double Scan)
Picture Element	1028 (H) x 508 (V)
Zoom	36X Optical AF, 32X Digital
Resolution	700 TVL (Color), 800 TVL (BW)
Scanning Frequency	15.734KHz (H) x 60Hz (V)
Scanning System	Progressive(WDR On)/ Interlace
Focus	Auto / Zoom -Tilt / Manual
Focal Length	3.4mm ~122.4mm (F* 1.8 to 4.5)
Iris Control	Auto/Manual Selectable
Day & Night Mode	DSS & ICR
Min. Illumination	Color : 0.5lux
ICR	BW : 0.2 lux
DSS	Color : 0.001 lux
ICR+DSS	BW : 0.0004 lux
S/N Ratio	More than 50dB(AGC off)
Sync. System	Internal

Input/output

Video Output	1 x BNC
Alarm In	8 alarm (NO/NC)
Alarm Out	2 relay out
Control Interface	RS485, RS422

Protocols

Supported Protocol	Multiple protocol (PELCO-DIP, VISCA)
Baud Rate	2400, 4800, 9600, 19200, 38400, 57600 bps selectable

Electrical

Power Source	21~28VAC 60Hz
Power Consumption	18 Watts
Heater	33 W
Fan	3.4 W

Mechanical

Pan	360° Endless Pan 0.1° to 90°/sec (64 steps proportional to zoom)
Preset Speed	380°/sec, 0.1° accuracy
Tilt	0.1°/sec to 90°/sec
Preset Speed	150°/sec, 0.1° accuracy
Dimensions	236(Ø) x 323.7(H) mm - 166(Ø) dome
Weight	Approx. 4.4Kg (10.8 lbs)

Environmental

Operating Temp.	Indoor 0°C ~ 50°C
	Outdoor -10°C ~ 50°C
Operating Humidity	0% ~ 90% (Non-Condensing)
Ingress Protection	IP66
Bubble	Ø 166mm, Polycarbonate Cover
Construction	Aluminum
Colour	Cool Gray

Approvals

Approvals	CE, FCC CLASS A, RoHS
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Functions

Dome ID	Up to 255 selectable ID (rotary switch)
Preset	255 points, less than 0.1 accuracy
Tour	8 programmable
Pattern	4 patterns for 240 second
Digital Flip	ON/OFF
Auto Scan	8 programmable speed & diagonal
Privacy Zone	Off/8 Zones
Backlight	WDR/ BLC/ OF
DBI Control	Auto / Sens-in / Ext / Day / Night
Brightness	1 ~ 16 steps
Gain Control	Off / On
White Balance	ATW / One-Push / Indoor / Outdoor / Manual / Auto
Digital Zoom	CR / Max 2x ~32x
Shutter Speed	Normal ~1/100,000sec
DNIR	CR / Manual / Auto
Display	16 area title

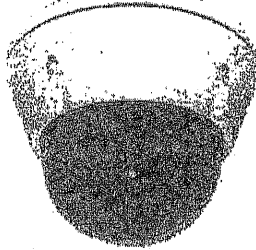
130122 Note: Specifications are subject to change without notice.

G4S plc., The Manor, Manor Royal, Crawley, West Sussex, RH10 9UN, UK. www.g4s.com



Vandal-Proof Dome

GCD705-VWU



- 700 TV Lines Ultimate High Resolution
- Day & Night with True Night function, 0.03 Lux Sensitivity
- New enhanced video analysis: (Motion Detection & Tracking, Abandon Detection, Scene Change, Unfocus Detection, Loitering Detection)
- Privacy Masking Zone & Wide Dynamic Range
- Powerful 3D-DNR (3D-Digital Noise Reduction)
- New digital effects (Rotation, Mirror, V Flip, Mega, Freeze)
- Vandal-Proof Aluminum Die-cast, IP66
- Unshielded Twisted Pair (UTP) for far distances transmission

Technical Specifications

Sensor		Camera	
Image sensor	1/3" Sony 4624 DS SUPER HAD II CCD	White Balance	A1 (W) Push/ User1/ User2/ Auto CW
Effective Pixel	GCD705-VWU 976 (H) x 582 (V) GCD705N-VWU 976 (H) x 494 (V)	Shutter Speed	Manual/ Push Lock 1/50-1/10,000 Auto : ~100,000 1/50-1/10,000 Auto : ~100,000 (NTSC)
Scanning system	2:1 Interlace	Language	English, French, German, Portuguese, Spanish
Scanning frequency	GCD705-VWU 15.625KHz(H), 50Hz(V) GCD705N-VWU 15.734KHz(H), 59.95Hz(V)	Sens-Up	x256
Sync. system	Internal / Line Lock		
Video		Input/output	
Resolution	700 TVL	Video output	1 x BNC (1.0Vp-p, 75ohms), UTP
Day & Night Mode	ICR & DSS	Power Input	2-Pin Terminal Block
Min. illumination	0.14 Lux (Color), 0.03 Lux (BW) @ F1.2		
S/N ratio	50dB More than 50dB		
Lens		Control	
Focus	Vari-focal	Camera Control	Joystick Switch
Focal length	3.6 ~ 12mm	Protocols	Pelco-D, Pelco-P, Fastrox II
Lens Mount	Board Type		
Pan/Tilt Range	0° - 360°/ 0° - 180°		
Rotate Range	0° - 360°		
Functions		Mechanical	
Video Analytics	4 configurations max. 10 jobs Motion Detection & Tracking, Abandon Detection, Scene Change, Unfocus Detection, Loitering Detection	Dimensions	146.2mm Ø x 114.5mm H Bubble Ø 99
Privacy Zones	Max 10 (Polygonal)	Weight	740g
DIS	Off/ On	Ingress Protection	IP66/ IK10
3D-DNR	Median Adaptive 3DNR		
WDR	30 FPS 54dB DUAL SCAN		
SLC	Yes		
Focus Aid	Yes		
D-PTZ	~ n4(Zoom), D-PTZ Support		
Ultra Deep Field (UDF)	Yes		
Image Enhancement	ATR-EX		
Digital Effects	Rotation, Mirror, V Flip, Mega, Freeze		
		Electrical	
		Power source	DC 12V / AC 24V± 10%
		Power consumption	TBD
		Environmental	
		Operating temp.	-10°C ~ +50°C
		Operating humidity	20 ~ 80% RH
		Approval	
		Approvals	FOC (Class A), UL C8(Class A)

Note: Specifications are subject to change without notice.

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G4S plc., The Manor, Manor Royal, Crawley, West Sussex, RH10 9UN, UK.

www.g4s.com

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Digital Video Recorder GDR1000A Hybrid

- Up to Real-Time Recording 400ips @D1(Analog) + 70ips @2MP(P)^{**}
- Real-Time Analog Monitoring @ Full HD^{*}
- Up to 3 monitors can be connected simultaneously for Live and Playback
- H.264 Effective Video compression
- 5 x SATA II HDDs with e-SATA optional External storage
- Automatic Mass Archiving to eSATA RAID and Built-in Mirroring
- Maximum Stability with Linux RTOS on Flash
- Two-way Audio Communication
- Up to 30 minutes pre-event recording
- Extreme Remote Management, Built in WebGuard
- Advanced Search Engine & Playback Modes with intrusion detection, Video obscuration detection, Museum search, Multi-channel video export
- ATM/POS Interface
- Compatible with G4S IP Cameras, Onvif & 3rd party cameras



Technical Specifications

Video	
Signal format	PAL or NTSC (Auto detect)
Compression	H.264
Monitoring	
Analog: PAL/NTSC	15/30 ips/cam @HD [*] and/or SD [*]
IP: PAL/NTSC or progressive	24ips @2MP(1920x1080), 400/480ips @CIF
Recording	
Analog: PAL/NTSC	400/480 ips @720x576/480 (HCF/D1)
IP	70ips @2MP(1920x1080), 140ips @CIF
Playback (Full duplex)	
Analog: PAL/NTSC	400/480 ips @720x576/480 (HCF/D1)
IP: PAL/NTSC or Progressive	24ips @2MP(1920x1080), 400/480ips @CIF

Input/output	
7 Primary monitors provide live & playback monitoring at 1080p resolution and 1280x800 resolution, monitor resolution up to 1280x800	
Video inputs	16 x BNC + 16 x IP inputs ^{**}
Loops	16 x BNC (E.OV/p-p, 75ohms)
Main monitor	1 HDMI (HD [*]), 1 VGA (HD [*]), 1 BNC (SD [*])
Secondary monitor	1 VGA (SD [*]), 1 BNC (SD [*])
Spot monitor	1 BNC (16CH Multiplexed)
Alarm input	16 x TTL, NC/NO programmable
Alarm output	4 x Relays
Alarm reset input	1 x TTL
Network connectivity	RJ-45 port, Gigabit Ethernet
Audio inputs	4x RCA + 12x D-Sub
Audio output	1 x RCA
RS-232C serial port	1 x DB9
RS-485 serial port	2-conductor terminal block
ESCSI port	RJ-45 port
e-SATA	yes
USB ports	2 x USB 2.0
IR port	Built-in, remote included
USB Printer/ Mouse	Optional (Postscript)/Optional
Log & shuttle	Yes

Functions	
Recording modes	Time-lapse, event, Pre event (30), panic
Recording events	Motion detection, video loss, video blind alarm-in, tamper (ATM/POS)
Search & playback	Time-table, extension go to, event, watch-in, museum, motion, digital zoom
Motion detection	16x12grd, 5 sensitivity levels, D&N
Event actions	Email, remote SW, PTZ, spot
Data export	Clip player (multi-ch), AVI, JPG
Video authentication	Chained fingerprint encryption
Access rights	64 groups, 256 users
Firmware upgrade	USB, remote SW
Time sync	Yes, can act as server
Network	DVRMS, static IP, DHCP, ADSL
Remote functions	Monitoring, search, setup, map, sys check, alarm, callback, PTZ, panic recording, export, upgrade
Remote Software	INEX, RASplus, IRas, Resmobile, WebGuard (Internal & External)
Remote connections	Watch 16, Search 2, Admin 2-ips, ips
Bandwidth control	Virtual Network Conn. (Remote desktop)
VNC ^{***}	System, recording, alarm-in, storage
DVR self-check	Yes
OS on flash recovery	Yes
Text-in	Yes, Up to 14Ch
Languages	English, French, German, Spanish, Italian, Polish, Hungarian, Czech, Russian, Korean, Japanese, Chinese (Trad, Simp.)

Storage	
Internal storage	Up to 4 SATA II HDDs, DVD-RW, RAID 1 (Up to 3 SATA II HDDs)
External storage	eSATA, ESCSI RAID, HDD
Logical Storage	USB, HDD, DVD/RW, FlashDrive
	Up to 18TB Internally & Externally

Electrical	
Power source	100 - 240 VAC, 1 - 2A
Power consumption	Max. 100W

ENVIRONMENTAL	
Operating temp.	5°C - 40°C
Operating humidity	35% - 90%

Approvals	
Approvals	FCC, UL, CE, CB

Mechanical	
Dimensions	430 W x 86 H x 490 D mm
Unit weight	10.4kg

* Full HD, 1920x1080, 50, 720x480 (HD), 720x576 (P)
 ** Hybrid Full HD needs software license
 *** If Analog Camera, an alarm to separate monitor depend on the product, please check details

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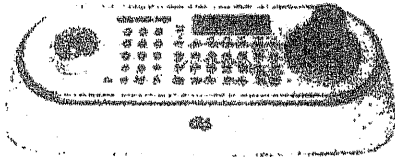
Notes: Specifications are subject to change without notice. 130616

G4S plc., The Manor, Manor Royal, Crawley, West Sussex, RH10 9UN, UK. www.g4s.com



Keyboard Controller

GSV01



- Variable speed control joystick zoom controlling handle
- Built-in 16x2 LCD Display
- Program and recall programmed preset positions, auto scan, tour, pattern, from the selected dome camera
- Two levels of password are supported for higher security, administrator and user.
- Up to 254 dome cameras controllable including 64 dome cameras with Alarm mode & 99 DVRS
- Up to 3 slaves keyboard controller can be connected to the master keyboard
- Advanced Joystick Pan/Tilt/Zoom
- Professional Jog and Shuttle Functionality

Technical Specifications

Communication

Interface	Interface RS-485/232
Display	16 X 2 Line LCD
RS485	Dome1, Dome2 Ports
Baud Rate	2,400 - 38,400bps
Dome1 Port (RS-485)	Up to 127 dome cameras incl. 32 Alarm mode on.
Dome2 Port (RS-485)	Up to 127 dome cameras incl. 32 Alarm mode on
Protocol	Slave Keyboard / DVR
RS-232	Pelco-PID, FI, File
Data2/Data1	DVR / Upgrade
	For Optional J-Box

Control

Jog Dial	DVR playback control
Joystick	3 Axis twist zoom
Function	Keyboard Buttons

Electrical

Input Power	12 VDC
Power Consumption	5W
	Power Adaptor Incl.

Environmental

Operating temp.	0°C to 50°C
Operating humidity	0%-90% RH (non-condensing)

Mechanical

Dimensions (W x H x D)	105x176x107 (mm)
Unit Weight	Approx 1.2 kg

Approvals

Approvals	CE EMC, FCC CLASS A
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Notes: Specifications are subject to change without notice.

130701



G4S plc., The Manor, Manor Royal, Crawley, West Sussex, RH10 9UN, UK.

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