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RECEIVED
 OFFICE OF PUBLIC ACCOUNTABILITY
 PROCUREMENT APPEALS
 DATE: 11/22/13
 TIME: 9:15 AM PM BY: Thyges
 FILE NO OPA-PA: 13-013

Attorneys for Appellant
 G4S Security Systems (Guam) Inc.

BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEAL

In the Appeal of)
)
 G4S SECURITY SYSTEMS (GUAM) INC.)
)
 Appellant.)
 _____)

Docket No. OPA-PA-13-013
APPELLANT’S LIST OF ISSUES

Appellant G4S Security Systems (Guam) Inc. (“G4S”) submits its list of issues as follows. For purposes of this list, G4S will state the issues without “spin”, while reserving the right to frame the issues more argumentatively in its hearing brief and at the hearing.

1. Was the omission of Amendment No. 2 and Clarification No. 2 from the G4S bid a minor informality that should not have resulted in the rejection of the G4S bid?
2. Even if the above-referenced omissions are found not to be a minor informality, is the Guam Department of Education estopped from asserting these omissions as grounds for deeming the G4S bid non-responsive because of the manner in which G4S was (or was not) given notice of the amendment and clarification?

ORIGINAL

In the Appeal of G4S Security Systems (Guam) Inc.
Appellant's List of Issues
OPA-PA-13-013

3. Has this appeal been rendered moot due to issues pertaining to funding for this procurement?

Respectfully submitted,

DOOLEY ROBERTS & FOWLER LLP

Date: November 22, 2013

By: Seth Forman

SETH FORMAN

Attorneys for Appellant G4S Security
Systems (Guam) Inc.