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FILE NO OPA-PA: 17-10

**BEFORE THE PUBLIC AUDITOR  
PROCUREMENT APPEALS  
TERRITORY OF GUAM**

IN THE APPEAL OF ) Docket No. OPA PA-17-10  
)  
CORE TECH INTERNATIONAL ) **APPELLANT CORE TECH**  
CORP., ) **INTERNATIONAL CORP.'S**  
) **LIST OF ISSUES**  
Appellant. )  
)

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

Appellant Core Tech International Corp. hereby submits the following List of Issues in the above-captioned matter:

1. Did the Department of Public Works ("DPW") wrongfully terminate the Design-Build Contract for the Route 1/Route 8 Intersection and improvements ("the Contract") by failing to give CTI notice of default and an opportunity to cure?
2. Did the DPW wrongfully terminate the Contract in retaliation against CTI for successfully pursuing protests and appeals relating to DPW's violations of law in the Simon Sanchez High School bids?
3. Did DPW substantially breach the Contract?
4. Did DPW wrongfully assess liquidated damages against CTI?

DPW failed to timely file and serve a complete Procurement Record as required by the Rules of Procedure, and Appellant reserves the right to amend or supplement this List of Issues. In addition, Appellant reserves the right to amend or supplement this List of Issues generally due to other issues that may arise at the hearing of this matter, or for impeachment or rebuttal purposes.

Dated this 22nd day of November, 2017.

**ARRIOLA, COWAN & ARRIOLA**  
Counsel for Core Tech International Corp.

By:   
ANITA P. ARRIOLA