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OFFICE OF PUBLIC ACCOUNTABILITY PROCUREMENT APPEALS

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Attorneys for TakeCare Insurance Company, Inc.

OFFICE OF PUBLIC ACCOUNTABILITY PROCUREMENT APPEALS

IN THE APPEAL OF) APPEAL NO. OPA-PA-18-003
TAKECARE INSURANCE COMPANY, INC.,))) TAKECARE'S LIST) OF ISSUES
Appellant))
)
)

TakeCare Insurance Company, Inc. ("TakeCare") hereby maintains that the following list of issues require evidence or arguments to be presented at the hearing:

- 1. Whether the requirement that Guam Regional Medical Center ("GRMC") be included in the network of offerors is consistent with Guam and federal law;
- 2. Whether the Department of Administration ("DOA") and the Negotiating Team ("NT") violated Guam law and their rules and regulations when preparing the Request for Proposal;

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- 3. Whether the NT drafted and properly promulgated rules of procedure regarding the issues that would be considered when developing minimum qualifications for offerors;
- 4. Whether DOA and the NT have maintained a complete procurement record;
- 5. Whether personnel at DOA and the NT members had conflicts of interest that they failed to disclose and document in the procurement record;
- 6. Whether voting sheets were executed upon the casting of votes by NT members;
- 7. Whether improper communications occurred that required an investigation by the Attorney General's Office;
- 8. Whether DOA and the NT violated the automatic stay;
- 9. Whether GRMC being in network is necessary in emergency care situations; and,
- 10. Whether GRMC being in network is necessary in sole source situations.

Respectfully submitted this 13th day of July, 2018.

MAIR & MAIR, Attorneys at Law Attorneys for TakeCare Insurance Company, Inc.

DAVID A. MAIR