

1 Jacqueline Taitano Terlaje, Esq.  
2 **LAW OFFICE OF JACQUELINE TAITANO TERLAJE, P.C.**  
3 250 Route 4  
4 Suite 204, Nanbo Guahan 250 Building  
5 Hagåtña, Guam 96910  
6 Telephone 671.648.9001  
7 Facsimile 671.648.9002  
8 Email: [info@terlajelaw.com](mailto:info@terlajelaw.com)

9 Attorneys for Petitioner  
10 *Data Management Resources, LLC.*

**RECEIVED**  
OFFICE OF PUBLIC ACCOUNTABILITY  
PROCUREMENT APPEALS

DATE: 10/16/12  
TIME: 2:40  AM  PM BY: J-L  
FILE NO OPA-PA: 12-007

11 **THE OFFICE OF PUBLIC ACCOUNTABILITY – GUAM**  
12 **HAGÁTÑA, GUAM**

13 In the Appeal of ) DOCKET NUMBER. **OPA-PA-12-007**  
14 )  
15 )  
16 DATA MANAGEMENT RESOURCES, LLC, ) **APPELLANT’S VERIFIED APPLICATION**  
17 ) **FOR SUBPOENAS TO APPEAR FOR**  
18 Appellant. ) **HEARING ON THE MERITS**  
19 )  
20 )  
21 )  
22 )  
23 )

24 COMES NOW Appellant, DATA MANAGEMENT RESOURCES, LLC. (“DMR”), through  
25 undersigned counsel and hereby applies for the issuance of subpoenas to compel the attendance of  
26 witnesses for Hearing on the Merits scheduled for October, 22, 23 and 24, 2012. The Law Office of  
27 Jacqueline Taitano Terlaje, P.C. respectfully requests that the Office of Public Accountability issue the  
28 subpoenas on behalf of Appellant. The following material witnesses are identified for purposes of the  
issuance of subpoenas:

**ORIGINAL**

- 1
- 2 1. Bernadette Artero, Office of the Governor
- 3 2. Kenneth Borja, Department of Administration
- 4 3. Euphrasia Lujan, General Services Agency, Department of Administration
- 5 4. Benita Manglona, Department of Administration
- 6 5. Joseph Manibusan, Department of Administration

7 Pending the determination of the admission of Written Testimony by Deposition Transcription,  
8 Appellant respectfully requests that additional Subpoenas for the following Government of Guam  
9 employees issue in the event that the weight of written testimony will be less than the weight granted of  
10 oral testimony. DMR respectfully requests that the additional Government of Guam employees be  
11 subpoenaed for hearing:

- 12 6. Claudia Acfalle, General Services Agency, Department of Administration
- 13 7. Benigno Camacho, Department of Administration
- 14 8. Katherine Kakigi, Department of Administration
- 15 9. Rosita Fejeran, Treasurer of Guam, Department of Administration
- 16 10. Marissa Leon Guerrero, General Services Agency, Department of Administration
- 17 11. Euphrasia Lujan, General Services Agency, Department of Administration

18 RESPECTFULLY SUBMITTED on this 16<sup>th</sup> day of October, 2012.

19 **LAW OFFICE OF**  
20 **JACQUELINE TAITANO TERLAJE, P.C.**


21 By: \_\_\_\_\_

22 **JACQUELINE TAITANO TERLAJE**  
23 Attorney for Appellant


1 **VERIFICATION**

2 TERRITORY OF GUAM, )  
3 CITY OF HAGÁTÑA. )

4 DATA MANAGEMENT RESOURCES, LLC., by and through TRICIA T. CRUZ, being first duly  
5 sworn, deposes and says: That she is the authorized representative of Petitioner in the above-entitled  
6 matter; that she has read the foregoing **APPELLANT'S VERIFIED APPLICATION FOR**  
7 **SUBPOENAS** and knows the contents thereof; and certifies that the same is true as therein stated,  
8 except as to those matters stated upon information or belief, and as to those matters, she believes them to  
9 be true.

10 By:   
11 **TRICIA T. CRUZ**  
12 Its Duly Authorized Representative

13 SUBSCRIBED AND SWORN to before me this 16<sup>th</sup> day of October, 2012, by Tricia T. Cruz,  
14 Duly Authorized Representative of Data Management Resources, LLC.

15   
16  
17 Notary Public

18 **PRISCILLA CASTRO TORRES**  
19 **NOTARY PUBLIC**  
20 In and for Guam, U.S.A.  
21 My Commission Expires: **Mar. 05, 2016**  
22 P.O. Box 1119 Hagatna, Guam 96932